

BEACON GLOBAL
ADVISOR NETWORK

FORM ADV PART 2A

Item 1 – Cover Page

Beacon Global Advisor Network, LLC
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Atlanta, GA 30328

www.bganetwork.com

888-679-6474

December 31, 2025

This brochure provides information about the qualifications and business practices of Beacon Global Advisor Network, LLC. If you have any questions about the contents of this Brochure, please contact us at 888-679-6474 and/or emailcompliance@bganetwork.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Beacon Global Advisor Network, LLC also is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Beacon Global Advisor Network, LLC is 288833.

Any references to Beacon Global Advisor Network, LLC as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.

Item 2 - MATERIAL CHANGES

The most recent annual update to this brochure is dated December 31 2024.

There have been no material changes made since the last filing.

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At least annually, this section will discuss only specific material changes that are made to the Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

Pursuant to SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our fiscal year, which is December 31st. We may further provide other ongoing disclosure information about material changes as necessary.

Additionally, we will further provide you with a new brochure as necessary based on change or new information, at any time, without charge.

Our brochure may be requested free of charge by contacting the Compliance Department at 888-679-6474 or emailcompliance@bganetwork.com. Additional information about BGAN is also available via the SEC's website www.adviserinfo.sec.gov. The website also provides information about any persons affiliated with BGAN who are registered, or are required to be registered, as investment adviser representatives of BGAN.

Item 3 - **TABLE OF CONTENTS**

Item 1 – COVER PAGE Cover Page
Item 2 - MATERIAL CHANGES 2
Item 3 - TABLE OF CONTENTS 3
Item 4 - ADVISORY BUSINESS 4
Asset Management Services 5
Financial Planning and Consulting Services 6
Pension Advice for United Kingdom and other Nationals Expatriates 7
General Information 8
IRA Rollover Considerations 9
Item 5 - FEES AND COMPENSATION 11
General Disclosure 11
Asset Management Services 12
Financial Planning and Consulting Services 14
Pension Advice for United Kingdom and other Nationals Expatriates 15
Item 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT 19
Item 7 - TYPES OF CLIENTS 20
Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS 20
Item 9 - DISCIPLINARY INFORMATION 24
Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS 24
Item 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING 26
Item 12 - BROKERAGE PRACTICES 27
Item 13 - REVIEW OF ACCOUNTS 29
Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION 29
Item 15 - CUSTODY 31
Item 16 - INVESTMENT DISCRETION 32
Item 17 - VOTING CLIENT SECURITIES 32
Item 18 - FINANCIAL INFORMATION 33
BEACON GLOBAL ADVISOR NETWORK, LLC'S PRIVACY NOTICE 34
Brochure Supplements

Item 4 - ADVISORY BUSINESS

Beacon Global Advisor Network, LLC (hereinafter referred to as "BGAN") is an investment advisory firm offering a variety of advisory services customized to your individual needs.

A. BGAN was established in April 2017. The principal owners and members of BGAN are: Mr. Joseph Gruber, President & Chief Compliance Officer (50%) and Mr. Randy Landsman, Vice President (50%) ownership, respectively.

BGAN is an investment adviser that consists of many independent contractors who have affiliated with BGAN as Advisory Representatives to offer the advisory services and programs described within this brochure. The Advisory Representatives ("AR") each have their own businesses and offices through which they conduct not only advisory business but provide other financial services. They market a variety of financial related services including accounting and insurance services not offered by BGAN through their independent businesses. These businesses are separate from and not affiliated with BGAN.

Advisory Representatives have a direct interest in the fee charged to you since BGAN will pay a portion of the advisory fee charged to you to your Advisory Representative. It is important to refer to the Item 5 – Fees and Compensation below. Our Advisory Representatives cannot exceed the fee disclosed under Item 5 below. However, the negotiability and the fee that you will pay for advisory services is determined between you and your Advisory Representative. **Therefore, another Advisory Representative will charge more or less for the same services.**

As an investment adviser, we are a fiduciary to our advisory clients. As fiduciaries, we are expected act and provide advice in the best interests of clients; have a duty to be loyal to our clients; make full and fair disclosure of all material conflicts of interest; seek best execution for client transactions; ensure that investment advice is suitable for clients' objectives, needs and circumstances; have a duty to have a reasonable, independent basis for investment advice; and refrain from effecting personal securities transactions that are inconsistent with client interests.

B. BGAN offers the following advisory services. Each of the services is more fully described below.

- Asset Management
- Financial Planning
- Retirement Consulting Services
- Analysis, Recommendation and Monitoring of Third-Party Managed Programs
- Pension Advice and Asset Management for United Kingdom and other Nationals or Expatriates

Asset Management Services

BGAN will provide continuous and ongoing management of your account. Unless otherwise expressly requested by you, BGAN will manage your portfolio on a discretionary basis and will make changes to the allocation as deemed appropriate by BGAN. BGAN will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation with you. BGAN from time to time will actively trade securities and hold such holdings for periods of 30 days or less or maintain positions for longer- or shorter-term periods at the discretion of your Advisory Representative.

BGAN's asset management program includes the use of a Unified Managed Account Program in which BGAN uses various managers and their managed models to assist BGAN to provide asset management of your account. Your advisory representative designs a customized management portfolio using a combination of individual securities, mutual funds, exchange traded funds (ETFs), and third-party managers, strategists and model portfolios managed by various third-party managers.

By execution of the BGAN Discretionary Asset Management Agreement, you will grant discretionary authorization to BGAN and your Advisory Representative to manage your account including selecting an overlay manager(s) and model account strategist, or third-party managers (collectively referred to as "Third-Party Service Providers"). In addition, you will authorize the custodian to follow our instructions as well as instructions given by Overlay Manager to effect transactions, deliver securities, deduct fees and take other actions with respect to the client account. For additional information about discretionary authorization, please refer to Item 16 – Investment Discretion below.

It is important you read the Disclosure Brochure to the Third-Party Service Providers prior to entering into any agreement to use a Third-Party Service Provider. The Disclosure Brochure contains important information about the fees, services, and conflicts of interests associated with the program and the Third-Party Service Provider. In platforms such as SMArtX Advisory Services and Adhesion where multiple managers and strategists are available, BGAN has access to Form ADVs of the individual managers selected to manage your account. You can request a copy of any manager's Form ADV upon request.

If you elect to have your accounts managed on a nondiscretionary basis, no changes will be made to the allocation of your account without prior consultation with you and your expressed agreement. Nondiscretionary is not available when an overlay management strategist or model account management strategy is utilized. There is risk with electing to have your account managed on a non-discretionary basis. The risk is that your Advisory Representative will not be able to conduct transactions in a timely manner. If you have your custom allocated accounts managed on a nondiscretionary basis, your Advisory Representative cannot make changes to the allocations in your account without prior consultation and your expressed agreement. With accounts managed on a nondiscretionary basis, there is an inherent risk your Advisory Representative will not be able to contact you in a timely manner in volatile markets. Your Advisory Representative will not be able to mitigate the effects of sharp market declines in an efficient manner without your expressed permission.

BGAN primarily uses managed models managed by third party managers, exchange traded funds, open-ended mutual funds, and no-load and load waived mutual funds. Load waived mutual funds will include institutional shares or mutual funds purchased at net asset value (NAV). Mutual funds purchased at NAV will have higher internal expenses and will cost the client more. Additionally, managed accounts can include: equity and fixed income securities. However, managed accounts are not exclusively limited to the aforementioned types of securities and include other securities such as variable products, alternative investments, options, and other securities deemed suitable for your portfolio by the Advisory Representative.

A client can request a current copy of any manager's or strategist's Form ADV Part 2A upon request. Additionally, a current version of the disclosure brochure is available on the SEC's website at www.adviserinfo.sec.gov.

Transactions in the account, account reallocations and rebalancing often trigger a taxable event, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts.

Financial Planning and Consulting Services

BGAN offers broad-based and modular financial planning services. Financial planning services will typically involve providing a variety of services, principally advisory in nature, to clients regarding the management of their financial resources based upon an analysis of the client's individual needs. BGAN uses financial planning software to assist with determining the client's current financial position and define and quantify long term goals and objectives. The financial planning software will run hypothetical scenarios based on variables to assist a client to determine a course of action. In no way can any program or software predict future results. It is a tool to enable analysis based on historical information to review possibilities that could occur if historical events repeat.

A financial plan will analyze the following areas:

- **Personal:** family records, budgeting, personal liability, estate information and financial goals
- **Tax and Cash Flow:** Income tax and spending analysis and planning for past, current, and future years. BGAN will illustrate the impact of various investments on your current income tax and future liability.
- **Death and Disability:** Cash needs at death, income needs of the surviving dependents, estate planning and disability income analysis
- **Retirement:** Analysis of current strategies and investment plans to help you work toward retirement goals
- **Investments:** Analysis of investment alternatives and their effect on a client's portfolio.
- **Estate Planning:** Advice with respect to property ownership, distribution strategies, disposition of business interest, estate tax reduction, and tax payment techniques as well as discussion of gifts, trusts, etc. Further, a review of death and disability issues will be examined. Tax consequences and their implications are identified and evaluated.

- **Tax Planning:** Analysis of a financial situation or plan from a tax perspective. The purpose of tax planning is to find tax efficiencies, with the elements of the financial plan working together in the most tax-efficient manner possible.

Plans are based on your financial situation at the time and are based on financial information disclosed by you to BGAN. You are advised certain assumptions are made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. BGAN cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, it is important you continue to review the plan and update the plan based upon changes in your financial situation, goals, or objectives or changes in the economy. Should your financial situation or investment goals or objectives change, you must notify BGAN promptly of the changes. You are advised the advice offered by BGAN is be limited and is not meant to be comprehensive. Therefore, you should consider seeking the services of other professionals such as an insurance adviser, attorney and/or accountant.

You are not obligated to implement advice through BGAN or Advisory Representatives. Should you implement the plan with BGAN's Advisory Representatives commissions or other compensation is received in addition to the advisory fee paid to BGAN if the products are purchased through the Advisory Representative acting in the capacity as an insurance agent. The receipt of commissions is a conflict of interest.

Pension Advice for United Kingdom and other Nationals or Expatriates

BGAN provides pension consulting and advice to United Kingdom ("UK") expatriates or other nationals generally residing in the United States who have UK based pension plans. BGAN will gather financial information, goals, and objectives from the client and review the client's pension assets. You will be provided with an analysis, explanation, and recommendations about the current pension plan and the suitability and options available. **There are advantages and disadvantages to a pension transfer. It is important the client read the analysis carefully.**

It is important clients considering transferring their UK pension review consumer information provided at https://www.fca.org.uk/consumers.

The process begins with your authorization for BGAN to request a statement of benefit from the existing UK pension plan administrator or trustee. If suitable and in the client's best interest, and in conjunction with an FCA regulated advisor with the relevant permissions for the transfer of Safe Guarded Benefits for defined benefit plans, BGAN will assist with a transfer of pension assets to a Self-Invested Personal Pension ("SIPP"), a Qualifying Recognised Overseas Pension Scheme ("QROPS"), and/or other applicable plans.

Pension assets are held by a regulated pension trustee (authorized by the relevant financial services regulator where the pension plan is held) and subject to the terms and conditions of a separate agreement between the client and the pension trustee.

Your BGAN Advisory Representative will provide ongoing management of your pension assets. Management strategies can include the use of a third party selected investment manager (aka discretionary fund management (DFM)) (subject to the terms and conditions of a separate management agreement between the client's pension trustee and the investment manager). Assets are managed within a life bond platform such as: Utmost, Quilter or RL360 or on an investment platform such as: Novia; MorningStar (formerly Praemium,), Ardan International, or Capital International Group. Clients are encouraged to review the agreement between the client and the pension trustee and other disclosure materials (such as Key Features documents) provided by the pension trustee and the investment manager for a full understanding of the services provided and any associated costs therein.

Clients will receive a written assessment and recommendations of their pension review. Additionally, pension plan statements and other reports are generally sent directly to clients on an annual basis (unless requested more frequently) by the selected pension trustee, the custodian of record, and/or others similarly involved with the client pension plan. Clients are encouraged to review such material carefully for a complete understanding of the services offered and the costs associated with the management of such pension plans.

BGAN does not provide tax advice including, without limitation, in relation to any US tax reporting requirements and/or other tax implications arising in relation to clients' pension transfers. BGAN recommends the clients seek their own tax advice, including in relation to procedures under tax treaties between the United States and the UK (or other applicable jurisdiction) for the avoidance of double taxation on their UK/EU pension arrangements.

General Information

Investment recommendations and advice offered by BGAN are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform BGAN promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify BGAN of any such changes could result in investment recommendations not meeting your needs.

C. BGAN tailors the advisory services it offers to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities.

Services will begin with an initial consultation and data gathering. Your Advisory Representative will ask you various questions about your financial situation and request certain documents about your financial accounts. You may be asked to complete a fact finder or data gathering document. The information gathered by BGAN will assist BGAN to provide you with the requested services and customize the services to your financial situation. Depending on the services you have requested, BGAN will gather various financial information and history from you including, but not limited to:

- Retirement and financial goals
- Investment objectives
- Investment horizon
- Financial needs
- Cash flow analysis

- Cost of living needs
- Education needs
- Savings tendencies
- Other applicable financial information required by BGAN in order to provide the investment advisory services requested.

IRA Rollover Considerations

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

As part of our consulting and advisory services, we offer you recommendations and advice concerning your employer retirement plan or other qualified retirement account. Our recommendations can include you consider withdrawing the assets from your employer's retirement plan or other qualified retirement account and roll the assets over to an individual retirement account ("IRA"). Further, we offer our management services be applied to those funds and securities rolled into an IRA or other account for which we will receive compensation. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset-based fee as described above under Item 5. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation. You are under no obligation, contractually or otherwise, to complete the rollover. Furthermore, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by us.

It is important for you to understand many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of each.

An employee will typically have four options:

1. Leave the funds in your employer's (former employer's) plan.
2. Move the funds to a new employer's retirement plan.
3. Cash out and taking a taxable distribution from the plan.
4. Roll the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage it is important you understand the following:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.

   a. Employer retirement plans generally have a more limited investment menu than IRAs.
   b. Employer retirement plans often have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
   a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
   b. You should understand the various products and services you might take advantage of at an IRA provider and the costs of those products and services.
   c. It is likely you will not be charged a management fee and will not receive ongoing asset management services unless you elect to have such services. In the event your plan offers asset management or model management, there may be a fee associated with the services that is more or less than our asset management fee.
3. Our strategy can have higher risk than the option(s) provided to you in your plan.
4. Your current plan may offer financial advice, guidance, and/or model management or portfolio options at no additional cost.
5. If you keep your assets titled in a 401k or retirement account, you could delay your required minimum distribution beyond age 73. (You must take your first required minimum distribution for the year in which you turn age 73 (70 ½ if you reached 70 ½ before January 1, 2020 or 72 if you reached 72 prior to January 1, 2023). If you reach 70½ in 2020 or 72 in 2022, you have to take your first RMD by April 1 of the year after you reach the aforementioned age prior to the stated years age. For all subsequent years, including the year in which you were paid the first RMD by April 1, you must take the RMD by December 31 of the year. (Source IRS.gov))
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
   a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.

D. **Wrap Program**. BGAN does not offer a wrap fee program. Clients will pay a fee for asset management services, third-party manager(s) or strategist(s) if used, and transaction fees.

E. **Assets Under Management.** As of December 31, 2025, BGAN has $ 745,075,914 of regulatory assets under management. Of that number, $ 3,455, 178 is managed on a non-discretionary basis and $ 741,620,736 managed on a discretionary basis.

Some of our investment adviser representatives (IAR) are also registered with other, unrelated and unaffiliated investment advisers. Services provided through these other investment advisers are supervised by their own Chief Compliance Officer. Some services available to investors may not be available at both firms. In those situations, you must either forgo the service or do business with your IAR through the offering firm. Your IAR will provide you with disclosure and a client agreement that indicates the firm through which they are providing the service. In situations where the investor is conducting business with both affiliates, contracts for each will be executed.

Item 5 - FEES AND COMPENSATION

General Disclosure

As stated under Item 4, BGAN consists of a group of independent contractors who are registered or licensed with BGAN as Advisory Representatives offering the advisory services and programs outlined in this Form ADV Part 2A. **While no Advisory Representative can exceed the fees schedules outlined below, each Advisory Representative can negotiate and charge an advisory fee based on the fee schedules below. The amount of the fee is not commensurate with education or tenure in the industry. Therefore, there is another BGAN Advisory Representative who charges more or less than the fee you are being charged for similar services.**

Your Advisory Representative has a direct interest in the fee charged to you since BGAN will pay a portion of the advisory fee charged to you to your Advisory Representative.

The advice provided by Advisory Representatives often involves recommendations to invest assets according to an asset allocation primarily involving mutual funds, exchange traded funds, stocks, bonds, alternative products and other types of securities. Recommendations include investing into various share classes. Different share classes of securities involve different fee structures and internal costs. Institutional shares are often the least expensive from an internal cost perspective; however, the transaction fees can be higher. It is important you understand the internal cost structure of the various share classes. Additional information about costs and the various share classes can be found in the prospectus.

Registered investment company securities such as mutual funds, and variable products offer the securities in various share classes. Different share classes are priced differently and share classes other than institutional share classes will involve higher internal costs that over time will cost you more. Institutional share classes often have higher trading costs. A client needs to consider the amount being invested and the length of anticipated holding to make a decision as to the share class most suitable to the client. Representatives will select the lowest share class funds available and appropriate to the situation. However, in selecting the lowest share class, trading costs are sometimes higher. Selecting the lowest share class appropriate to the situation does not imply the

lowest cost share class. Instead, your Advisory Representative will select what they deem lowest cost for the situation. Representatives consider the anticipated holding period, cost structure, and administrative and transaction costs associated with selecting a share class. However, there is no way to predict the future and there could be occasions where a holding is liquidated sooner or held longer resulting in higher costs to the client. Additional information about share classes can be found in an Investor Alert issued by the Securities and Exchange Commission at https://www.investor.gov/additional-resources/news-alerts/alerts-bulletins/investor-bulletin-mutual-fund-classes and https://www.investor.gov/additional-resources/news-alerts/alerts-bulletins/investor-bulletin-mutual-fund-classes. Additionally, the SEC and FINRA provides investor information at www.sec.gov and www.finra.org.

It is important to note that institutional share classes for UK pension assets are often not available unless the client meets the minimum investment amount which is often high.

Asset Management Services

A. **Fee Schedules**

Fees are negotiable and are not based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds.

You may make additions to the Account or withdrawals from the Account. Additional assets deposited into the Account after it is opened will be charged a pro-rata fee based upon the number of days remaining in the then current calendar month. Additionally, partial withdrawals from the account will result in a prorated portion of the fee being credited to the Account. Fee adjustments for inflows and outflows in accounts charged based on the average daily balance will be factored into the monthly fee using the average daily value of the account. No fee adjustments will be made for Account appreciation or depreciation.

Advisor Directed Managed Program Fee Schedule

Fee Breakpoint Levels	Advisor Directed Maximum Advisory Fee*
Up to $5,000,000	1.35%
Over $5,000,000	0.85%

*Advisor Directed managed accounts do not pay a custodian asset-based fee. Instead, the client pays custodian transaction charges in accordance with the custodian's transaction fee schedule for each transaction. The custodian offers some securities, a limited number of open-ended mutual funds and exchange traded fund, at no transaction fee. However, the security positions will be subject to a holding period or the client will incur early redemption fees which could be substantial in comparison to a transaction fee. All fees are negotiable at our discretion.

Your Advisory Representative will have the discretion to determine:

- **How the fee will be determined**
  *Option A***:** A monthly fee will be calculated based on the average daily value of each account registration under management (e.g., you have four accounts, therefore, each account is charged a fee based on the average daily account value based on the negotiated fee schedule).

  Option B: A monthly fee will be calculated based on the aggregated or household average daily value of all managed accounts for the household.

For example, if you have four managed accounts with an average daily value as of the just completed calendar month of: $1,000,001, $2,000,000, $500,000, and $1,500,000 with a total value of $5,000,001, you will not pay a fee on the managed accounts greater than 0.85%.

- **Valuation of the account for purposes of calculating the fee and fee structure**

  BGAN Advisor and BGAN Program fees will be determined and calculated based on the average daily balance of the account for the calendar month.

- **Fee timing**

  Charles Schwab Accounts

  For all accounts, fees will be billed in arrears of each calendar month.
  NOTE: A select group of accounts will remain billed in advance as indicated in their agreements

  InterActive Broker Accounts

  For all accounts, fees will be billed in arrears of each calendar month.

BGAN can change the above fee schedule upon 30-days prior written notice to you.

Alternative Products (real estate investment trusts, special purpose vehicles, private placements)

Alternative products are generally illiquid and a regular valuation is typically not obtainable. Clients with a position in alternative products will be charged an annual fee not to exceed 1% of the client's investment into alternative products. One-twelfth (1/12) of the annual fee will be charged each calendar month and will be deducted from a designated managed account at an account custodian.

B. *Collection of Advisory Fees.* Advisory fees are collected directly from your account, provided you have given BGAN written authorization. Written authorization is granted to BGAN by execution of the client advisory agreement. You will be provided with an account statement

reflecting the deduction of the advisory fee direct from the account custodian. If the Account does not contain sufficient funds to pay advisory fees, BGAN has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. You may reimburse the account for advisory fees paid to BGAN, except for ERISA and IRA accounts.

C. *Additional Fees and Costs.* In addition to the advisory fees above,

- Transactions in the Adviser Directed program you (the client) will pay transaction fees for securities transactions executed in your account in accordance with the custodian's transaction fee schedule.
-
- Additionally, you will pay fees for custodial services, account maintenance fees, transaction fees, and other fees associated with maintaining the Account. Such fees are not charged by BGAN and are charged by the product, broker/dealer or account custodian. BGAN does not share in any portion of such fees. Additionally, you will pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund purchased. Such advisory fees are not shared with BGAN and are compensation to the fund- manager.
- Custodians assess a custodial charge for alternative investments for their administration and reporting requirements. Such custodial charges will vary among custodians and can be as high as $350 per holding.

D. *Termination Provisions.*

You may terminate investment advisory services obtained from BGAN, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with BGAN. You will be responsible for any fees and charges incurred from third parties as a result of maintaining the Account such as transaction fees for any securities transactions executed and Account maintenance or custodial fees. Thereafter, you can terminate investment advisory services upon delivery to BGAN and your Advisory Representative of your written notice to terminate.

- Fees Paid in Arrears: Should you terminate or transfer funds and securities out of the account prior to the end of the calendar month, you will be charged a prorated advisory fee for the month up to the date of termination. In the event you transfer the account, and no funds or securities remain in the account for BGAN to deduct its advisory fee, you will be sent a fee invoice. Fee invoices must be paid within 30 days of the date of the invoice or late fees of $15 per 30 days after the date of the invoice will be charged plus interest of 18% per annum will be assessed until the invoice is paid in full.

- Fees Paid in Advance: You will receive a prorated refund of fees paid in advance thru the end of the quarter in which you terminate or transfer funds or securities out of your account(s).

Financial Planning and Consulting Services

Fees for planning services are strictly for planning services. Therefore, you will pay fees for additional services obtained such as asset management. It is your Advisory Representatives discretion whether or not to waive a portion or all of any financial planning or consulting fee if you

implement advice through your Advisory Representative and participate in an asset management program or service.

Fees are negotiable. Your fees will be dependent on several factors including time spent with the Advisory Representative, number of meetings, complexity of your situation, amount of research, services requested and staff resources, and your Advisory Representative.

Fee Type	Maximum Fee	Payable
Fixed Fee	$4,000	A fee payment schedule will be negotiated and agreed upon between you and your Advisory Representative prior services beginning and will be outline in the client advisory agreement. Fees are: 1. Payable one-half (1/2) upon execution of the advisory agreement with BGAN and the balance due at the time of presentation of the plan or recommendations; 2. Quarterly installments with the full amount due upon presentation of the plan or recommendations; or 3. Due in full at the time of presentation of the plan or recommendations.
Hourly Fee	$300 per hour	Payable as invoiced by BGAN.

Termination Provisions

You may terminate advisory services obtained from BGAN, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with BGAN. Thereafter, you may terminate investment advisory services with 30-days written notice to BGAN. You will be responsible for any time spent by BGAN.

Pension Advice for United Kingdom and other Nationals or Expatriates

There are multiple fees clients will pay when electing to transfer a U.K. pension to a Self-Invested Personal Pension ("SIPP") or Qualifying Recognised Overseas Pension Scheme ("QROPS") including:

- FCA required suitability report costs (required for defined benefit transfers)
- Initial planning and analysis fee
- Ongoing asset management fees
- Discretionary fund manager fees
- Investment platform, custodian, and trustee fees, and transaction and dealing fees.

Clients will pay an initial fee covering time and services for analysis and planning, advice, consultation, and review and establishment of a SIPP, QROPS, or other applicable plan. The initial fee is deducted directly from the value of the assets transferred, unless directly paid by the client. **The fee is a contingent fee, meaning client will only pay the fee if the client elects to transfer their pension. This is a conflict of interest because there is an incentive to recommend a transfer in order to receive compensation.** To mitigate this conflict of interest this disclosure is provided, and clients should discuss the transfer with another professional. The fee is a percentage fee based on the value of the pension assets to be transferred as further described below.

In addition to the initial fee, if the client has a defined benefit plan the client will pay a fee to a U.K. qualified Advisor to prepare the U.K. suitability report, which can be $4,000 or more, depending on the UK Advisor, the value of UK pension assets, and the time frame the report is needed. The fee is paid direct to the UK Advisor for the report and is not determined or set by BGAN or shared with BGAN or its advisory representatives. UK pension transfers with safeguarded benefits in excess of £30,000 are subject to review and analysis by a UK regulated adviser, unaffiliated with BGAN. The suitability report fee is charged to the client and is an added cost incurred by the client, whether or not the client decides to move forward with the pension transfer. The cost of the suitability report will be invoiced to the client or will be deducted directly from the pension asset once the transfer to the SIPP has been completed. In certain circumstances your BGAN Advisory Representative can agree to cover the cost of the report fee on your behalf and you will reimburse BGAN for the fee contingent on your pension transferring and out of the transferred assets. **This is a conflict of interest for your Advisory Representative to encourage a pension transfer in order to be reimbursed for the direct cost incurred.** To mitigate this conflict of interest this disclosure is provided. **It is important to understand costs before beginning the process of obtaining the report. Typically, U.K. qualified Advisors will advise against a transfer and will outline in their report their opinions. Regardless of the outcome, you will be subject to the report fee.**

After pension assets are transferred, client will pay an ongoing annual fee for monitoring, advice, consultation, and management on the investments and allocation of assets. Fees are negotiable and will be determined based on several factors including size of the pension assets, services being provided to the client, complexity of the situation, and consultations.

Initial Fee:

- The initial fee is calculated based on the value of the pension assets transferred from a defined benefit or defined contribution scheme to a SIPP. The is calculated by the trustee or platform provider and is agreed on between you and your advisory representative and is disclosed in the advisory agreement and in the trustee or platform application. The fee is negotiated between you and your advisory representative.

Fee Based on Total Transfer Value	Maximum Initial Advisory Fee
£0-£250,000	3.0%
£250,001-£750,000	2.5%
£750,001-£1,000,000	2.0%
Over£1,000,000	1.0%

- The initial fee will be due either:
  1) in full upon the decision to transfer assets and funds to a SIPP and QROPS; or
  2) paid through the purchase of an insurance bond or bond wrapper whereby BGAN and your advisory representative will be paid compensation. The compensation is in replace of the initial fee but will cost you more over a period of time. By purchasing a bond or investment wrapper you will be paying an internal cost for the wrapper which is paid over a period of years as agreed by you, but not to exceed ten years in addition to other costs and expenses for the bond. Therefore, there is added costs directly incurred by you for purchasing the bond rather than paying the entire fee upon transfer of the pension assets.

Electing to purchase the bond and incurring additional costs will enable you to invest a larger portion of your transferred pension assets verses the initial fee depleting the initial transferred value. However, the added cost will directly impact the performance of investment return of your SIPP account over time. It is important for clients to understand a bond purchase will increase the costs over time. There is no guarantee that the purchase of a bond wrapper will result in better or worse performance over time. **Further, early termination of the bond will result in the client incurring penalties including if death occurs during the non-surrender period.**

Clients purchasing a bond wrapper and attaining the age 55 or older when pension distributions may be eligible (as permitted under UK regulation) prior to the 5–10 year surrender period, will incur penalties if distributions are taken. Bond wrappers are not appropriate for clients with a potential need to take distributions from the account during the surrender period. A long-term investment time horizon of longer than 10 years is needed.

- If the initial fee is paid out of transferred pension assets, client is advised the fee will directly reduce the amount of assets available for investment.

- **In the United States the Securities and Exchange Commission requires investment advisers to disclose that when fees exceed 3% the fees are considered excessive in comparison to fees charged by other investment advisers for similar services. UK pension transfers involve several layers of fees as further described below under Additional Fees and Costs. Therefore, considering total fees a client will pay including our advisory fees, UK report writer, trustee, platform provider, etc. the fees can exceed 5% or more. It is important for a client to refer to charging schedules for all providers including investment fund costs.**

Annual Fee:

- SIPP and QROPS accounts will be charged an annual fee not to exceed 1.50% annually. The annual fee will begin upon completion of the transfer.
- Depending on the SIPP or QROPs provider, fees will be deducted from the account either: 1) quarterly in arrears or 2) monthly in arrears.
- Fees are calculated by the platform provider and based on the valuation date established by the provider.
- **Platform providers will typically not prorate fees for partial billing periods. Therefore, you will pay the full billing period (i.e., month or quarter) regardless of when assets were deposited to your account.**

Advisory fees will be collected directly from your account. As stated above, the platform provider or custodian will calculate advisory fees to BGAN. Written authorization is granted to BGAN to receive fees direct from the platform provider or custodian by execution of the client advisory agreement. You will be provided with an account statement reflecting the deduction of the advisory fee direct from the account custodian at a frequency as agreed by the platform provider. Additionally, you can request an account valuation at

any time. If the Account does not contain sufficient funds to pay advisory fees, BGAN has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees.

Additional Fees and Costs:
In addition to the fees outlined above, depending on the investment platform and SIPP provider or trustee, client is subject to the following fees and costs:

- Transaction fees and/or dealing costs
- Discretionary Fund Manager or Discretionary Manager fees
- Investment platform fees
- Establishment or set-up fee and annual fees charged by the SIPP provider
- Annual trustee or administrative charges
- Income or benefit set-up and annual fees charged by the SIPP provider
- If a portfolio bond is utilized there will be set-up fees, ongoing administration fees, and dealing fees per trade
- Exit penalty fees associated with the bond that decline over a period often over a 10-year period
- If mutual funds, exchange traded funds or other pooled investment vehicles are used, the client will pay a proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any fund purchased. Such advisory fees are not shared with BGAN and are compensation to the fund-manager.
- Exit fees are charged if changing platforms or trustees

Discretionary Manager or Third-Party Asset Manager:
A discretionary manager (DM) or also referred to as third party asset manager can be engaged to manage some or a portion of the SIPP assets. The DM will charge a fee up to 1.00% on the portion of assets allocated to the DM. Therefore, annual asset management fees can be 2.50% (i.e., 1.50 maximum BGAN fee plus 1.00% to the DM).

Additionally, such advisory fees are not shared with BGAN and are compensation to the fund-manager.

Additional Fees and Costs. In addition to the advisory fees above, you will pay transaction or dealing fees for securities transactions executed in your account in accordance with the custodian's transaction fee schedule. Additionally, you will pay fees for custodial services, account maintenance fees, transaction fees, and other fees associated with maintaining the Account. BGAN does not share in any portion of the aforementioned fees. The underlying investments in the SIPP will have internal costs that typically do not exceed 0.5%. This cost is borne by the investor and you will pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any exchange traded fund, mutual fund, or Undertakings for the Collective Investment in Transferable Securities (UCITS) purchased. Such fees are not charged by BGAN and are charged by the product, broker/dealer, trustee, or account custodian. BGAN does not share in any portion of such fees. Such advisory fees are not shared with BGAN and are compensation to the underlying fund manager.

Termination Provisions

You may terminate investment advisory services obtained from BGAN, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with BGAN. You will be responsible for any fees and charges incurred from third parties as a result of transferring and/or maintaining the account such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, you may terminate investment advisory services upon delivery to BGAN and your Advisory Representative of your written notice to terminate.

a. If termination occurs prior to the initiation of the transfer of pension assets, clients will be responsible for time and third-party expenses incurred, such as the FCA report prepared by the UK qualified Advisor.
b. If review, advice, and/or analysis of Client's United Kingdom pension have been initiated, Client will not be entitled to a prorated refund of the initial fee. The initial fee covers Adviser's time, analysis, and review of the pension assets and Client's financial situation.
c. Client will be responsible for and agrees to pay a prorated portion of the annual fee based upon the number of days in the quarter up to Adviser's receipt of Client's written notice to terminate (the "termination date").

We provide an additional service for accounts not directly held in our custody, but where we do have discretion, and may leverage an Order Management System to implement tax-efficient asset location and opportunistic rebalancing strategies on behalf of the client. These are primarily 401(k) accounts, HSA's, and other assets we do not custody. We regularly review the available investment options in these accounts, monitor them, and rebalance and implement our strategies in the same way we do other accounts, though using different tools as necessary. All clients engaging in Investment Management Services must either engage in Comprehensive Financial Planning or meet a $150,000 minimum of assets under management. This fee will be assessed and billed monthly. Specifically, the exact amount charged is determined by the daily average over the course of the month. The current exception for this is directly-managed held-away accounts, which are determined by the account value at the end of the month. In either case, if the Adviser only manages your assets for part of a month, the charge will be prorated. The advisory fee is a blended fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart and applying the fee to the daily average of the account value or the account value as of the last day of the previous month (per the paragraph above), resulting in a combined weighted fee. For example, an account valued at $2,000,000 would pay an effective fee of 1% with the annual fee being $20,000 (a monthly fee of $1666.67). Investment management fees are generally directly debited on a pro rata basis from client accounts. The exception for this is directly-managed held-away accounts, such as 401(k)'s. As it is impossible to directly debit the fees from these accounts, those fees will be assigned to the client's taxable accounts on a pro-rata basis. If the client does not have a taxable account, those fees will be billed directly to the client. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Item 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT

This section is not applicable to BGAN. BGAN does not charge performance-based fees.

Item 7 - TYPES OF CLIENTS

BGAN's services are geared toward individuals both high net worth (i.e., clients with a net worth of $2,200,000, exclusive of primary residence or has $1,100,000 under management with BGAN) and other than high net worth. Additionally, BGAN's services are suitable for businesses, pension and profit-sharing plans, and trusts. Furthermore, BGAN offers tailored advisory services involving pension transfer services to British expatriates living in the United States as further described in Item 4 and Item 5 above.

Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A. Each Advisory Representative conducts their own analysis to determine the securities and asset allocations they will use in a client's portfolio. They will use a variety of resources to gather information including but not limited to newspapers, magazines, due diligence visits and interviews with vendors, product literature and prospectuses, asset allocation programs and software. Advisory Representatives conduct economic analysis to attempt to analyze and determine trends as well as fundamental analysis. Fundamental analysis generally involves looking at economic and financial factors. Additionally, they will assess a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Some Advisory representatives employ technical market analysis and technical trend following. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns.

   Depending on the needs of the client and the investment philosophy of the Advisory Representative, long term, short term and active trading strategies will be utilized. Factors that result in a change to a client's portfolio include but are not limited to, economic factors, management changes with the security, tax law changes, objective change, and news or press releases, and financial changes with the client.

B. BGAN emphasizes that investment returns, particularly over shorter time periods, can be highly volatile and are dependent on a wide variety of factors. Thus, our investment management services are generally suitable only for long-term investment objectives or strategies, rather than for short-term trading purposes. Neither diversification nor asset allocation assure a profit or protect you against a loss, and there is no guarantee that your investment objectives will be achieved.

   You are advised investing in securities involves risk of loss, including the loss of principal. Therefore, your participation in any of the management programs offered by BGAN will require you to be prepared to bear the risk of loss and fluctuating performance.

   BGAN does not represent, warrantee or imply that the services or methods of analysis used by BGAN can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives

will be achieved. Further, no promises or assumptions can be made that the advisory services offered by BGAN will provide a better return than other investment strategies.

C. BGAN primarily uses mutual funds, exchange traded funds, UCITs (within a UK pension plan), individual equities and fixed income securities, and third-party service providers. The following are some of the primary risks associated with the securities and strategies utilized. Please do not hesitate to contact us to discuss these risks and others in more detail.

Mutual Funds and UCITs: Mutual fund fees are described in the fund's prospectus, which the custodian mails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's Web site. At the client's request at any time, BGAN will direct the client to the appropriate Web page to access the prospectus. The risks with mutual funds include

- Manager Risk: This is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.
- Market Risk: This is the risk that the Stock Market will decline, decreasing the value of the securities contained within the mutual funds we recommend to you.
- Industry Risk: This is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.
- Inflation Risk: This is the risk that the rate of price increases in the economy deteriorates the returns associated with the mutual fund.

Registered investment company securities such as mutual funds, and variable products offer the securities in various share classes. Different share classes are priced differently and have varying levels of internal costs and share classes other than institutional share classes will involve higher internal costs that over time will cost you more. Institutional share classes often have higher trading costs; however, the internal costs of the fund are lower. Over a period of time, share classes other than institutional shares will become more expensive if held in the account for a long period time. A client needs to consider the amount being invested and the length of anticipated holding to determine the share class most suitable to. Advisory Representatives will attempt to select the lowest share class funds available and appropriate to the situation. However, in selecting the lowest share class, trading costs are sometimes higher. Selecting the lowest share class appropriate to the situation does not imply the lowest cost share class. Instead, your Advisory Representative will select what they deem the lowest cost for the situation. Further, the lowest cost share class is not available with all platforms and custodians. Advisory Representatives consider the anticipated holding period, cost structure, and administrative and transaction costs associated with selecting a share class. However, there is no way to predict the future and there will be occasions where a holding is liquidated sooner or held longer resulting in higher costs to the client. Additional information about share classes can be found in an Investor Alert issued by the Securities and Exchange Commission at https://www.investor.gov/additional-resources/news-alerts/alerts-bulletins/investor-bulletin-mutual-fund-classes and https://www.investor.gov/additional-resources/news-alerts/alerts-bulletins/investor-bulletin-mutual-fund-classes. Additionally, the SEC and FINRA provide investor information at www.sec.gov and www.finra.org

Exchange Traded Funds (ETFs): ETFs are professionally managed pooled vehicles that invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. ETFs trade on an auctionable market. Therefore, there is more price fluctuation with ETFs than with mutual funds since ETFs trade throughout the day, whereas mutual funds are priced once a day. Also, since most ETFs only mirror a market index, such as the S&P 500, they won't outperform the index. While ETFs generally provide diversification, risks can be significantly increased for funds concentrated in a particular sector of the market, or that primarily invest in small cap or speculative companies, use leverage (i.e., borrow money) to a significant degree, or concentrate in a particular type of security rather than balancing the fund with different types of securities.

Individual Equities: The risks with stocks are prices fluctuate throughout the day. Stocks can drop in value and become worthless. The risks with stocks are market risk and company specific risk. The price of a stock can decline due to company-specific reasons as well as the health of the overall stock market. Even dividends, which many beginning investors believe are guaranteed payments by the company, can decline or be totally eliminated. Investing in micro, small or mid-sized companies involve risks not associated with investing in more established companies. Since equity securities of smaller companies do not always trade as often as equity securities of larger, more established companies, it is difficult or impossible for the securities to sell.

Bonds: Investing in bonds involves the assumption of risk including:

- Interest Rate Risk: which is the risk that the value of the bond investments we recommend to you will fall if interest rates rise.
- Call Risk: which is the risk that your bond investment will be called or purchased back from you when conditions are favorable to the bond issuer and unfavorable to you.
- Default Risk: which is the risk that the bond issuer is unable to pay you the contractual interest or principal on the bond in a timely manner or at all.
- Inflation Risk: which is the risk that the rate of price increases in the economy deteriorates the returns associated with the bond.

Alternative Products (real estate investment trusts, special purpose vehicles, private placements:
Investing in alternative and private placement investments involves unique and serious risks an investor must be prepared to bear. **It is crucial an investor reads the offering memorandum prior to investing for full disclosure of qualification requirements and risks including**:

- Operational, economic, market cycles and trends, investment, tax
- Risk of hedge funds, derivatives, and other investment vehicles
- Trading risks such as short selling, performance-based fees, limited operating and investment experience, consulting fees, interest and lending fees
- Use of leverage
- Illiquidity or limited liquidity
- Non-existence of or minimal secondary market
- Valuation complexities and limitations of valuations
- High degree of risk and potential loss of principal

Third Party Managers: Please refer to the third-party service provider's Form ADV and associated disclosure documents for details on their investment strategies, methods of analysis and associated risks. The risks with utilizing third party managed programs include:

- Market and economic risk.
- The risk the third-party manager is not managing to the objective or managing based on the stated strategy.
- The risk the securities managed by the third-party manager will decline or fluctuate impacting the overall performance of the portfolio.
- The risk that the performance of the portfolio will be diminished by the fees of the third-party manager and expenses associated with the securities.

Risks

The business of investing in securities is highly competitive and the identification of attractive investment opportunities is difficult and involves a high degree of uncertainly. Varied fluctuations in the price of investments are a normal characteristic of securities markets due to a variety of influences. Managed account programs should be considered a long-term investment and thus long-term performance and performance consistency are the major goals.

Tax Risk

Income tax costs result from the sale of individual securities within your account, unless the account is otherwise tax sheltered or tax deferred. Income tax costs directly reduce investment returns. Under the current income tax system, securities held less than one year that are sold at a gain (short term capital gains) are taxed at the client's highest marginal tax rate, and securities held greater than one year that are sold at a gain (long term capital gains) are taxed at a reduced long-term capital gains rate. Furthermore, the Alternative Minimum Tax (AMT) impact of long and short-term capital gains incurred in the tax year in question should be considered. Client is responsible for all tax liabilities arising from the sale of securities within the account.

International investing presents certain risks not associated with investing solely in the United States. These include, for instance, risks relating to fluctuations in the value of the U.S. dollar relative to the values of other currencies, custody arrangements made for foreign holdings, political risks, differences in accounting procedures and the lesser degree of public information required to be provided by non- U.S. companies.

Investing in emerging markets involves greater risk than investing in more established markets. Such risks include exchange rate changes, political and economic upheaval, the relative lack of information about these companies, relatively low market liquidity, and the lack of strict financial and accounting controls and standards.

Investing in fixed income securities involves special risks not typically associated with equity securities. These risks include credit risk, which is the risk of loss due to the inability to meet contractual debt obligations, and interest rate risk, which is the risk that an investment's value will change due to a change in the level of interest rates. Additionally, there is an inverse relationship between bond prices and interest rates specific to fixed income securities. As interest rates rise, bond prices fall and, conversely, as interest rates fall, bond prices rise.

Long-term purchases – Using a long-term purchase strategy generally assumes the Financial Markets will go up in the long-term which is not always the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall Financial Markets advance. Purchasing investments long-term creates an opportunity cost - "locking-up" assets that is be better utilized in the short-term in other investments.

Active Trading – frequent trading of securities; explain how frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes

Fundamental Analysis does not attempt to anticipate market movements. This represents a risk, as the price of a security can move up or down along with the overall market, regardless of the economic and financial factors considered in evaluating the security. The success of this strategy depends in large part on the ability to accurately assess the fundamental value of securities. An accurate assessment of fundamental value deepens on a complex analysis of a number of financial and legal factors. No assurance can be given that we can assess the nature and magnitude of all material factors having a bearing on the value of securities.

Quantitative Analysis: The risk of the analysis using mathematical and statistical modeling is that they are not accurately predict future investment patterns. Day to day changes in the market prices of investments follow random patterns and are not predictable with any reliable degree of accuracy.

Qualitative Analysis: The risk of analysis using more subjective criteria is that the information obtained to make the analysis is inaccurate and skews the analysis. In addition, measuring (or weighting) the criteria will likely be inconsistent from one analysis to another and could adversely affects the investment decisions.

No investment strategy can avoid loss. Investing in securities involves risk of loss that you need to be prepared to bear.

Item 9 - DISCIPLINARY INFORMATION

Investment Advisers must disclose any legal or disciplinary events that would be material to your evaluation of BGAN or the integrity of our services. In the most recent ten-year period, there are no events that have occurred requiring disclosure.

Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. For specific information regarding whether your Advisory Representative maintains multiple registrations with different entities please refer to your Advisory Representative's Form ADV Part 2B Item 2 and 4 disclosures.

Non-U.S. based advisors have qualifications and are associated with other licensed or regulated firms to offer securities and insurance products to clients outside the United States in non-US jurisdictions where regulatory permissions are granted. BGAN is not affiliated with the non-U.S. based licensed firms and does not participate in any compensation received for business conducted offshore and outside of BGAN. Furthermore, BGAN does not oversee or supervise activities of non-U.S. based advisory representatives conducting business outside the U.S. through the non-U.S. based licensed companies.

B. Certain Advisory Representatives are affiliated with other Investment Advisers for purposes of offering other advisory program, platforms, or services not available through BGAN. Please refer to your Advisory Representative's Form ADV Part 2B for disclosure regarding whether your Advisory Representative is associated with another investment adviser or has direct ownership in another investment adviser. Advisory Representatives offer advisory services that are similar or different from the advisory services offered through BGAN and services will cost more or less.

Certain advisory representatives engage in activities as an accountant outside of BGAN. Tax preparation and accounting services are not offered or sponsored by BGAN. Tax preparation and accounting services are an outside business activity from BGAN and are conducted through the advisory representative's independent business, unaffiliated with BGAN. Clients are under no obligation to participate in tax or accounting services offered by any advisory representative.

Certain advisory representatives are licensed insurance agents. BGAN does not offer or sponsor insurance products or services. The insurance business engaged in by advisory representatives is an outside business activity and is unaffiliated with the services offered by BGAN. Clients are under no obligation to participate in insurance products or services offered by any advisory representative. Advisory Representatives, who are insurance, licensed, have a conflict of interest to recommend and offer insurance products and services to you because they will earn a commission. **Insurance products pay high commissions to licensed insurance agents. Therefore, the advisory representatives who are licensed insurance agents have an incentive by the receipt of high commission to recommend insurance products such as fixed index annuities. Fixed index annuities and other insurance products are not securities products.** To mitigate this conflict of interest this disclosure is provided to you. Further, you are encouraged to seek a second opinion on any insurance recommendations. Before purchasing any insurance product including a fixed index annuity, it is important to ensure you have adequate liquidity since insurance products are not immediately liquid and/or carry high and long-term surrender periods.

BGAN is not and does not have a related person who is a: futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. Further, BGAN is not and does not have a related person who is: broker/dealer or other similar type of broker or dealer; investment company, futures commission merchant or commodity pool operator; banking or thrift institution; lawyer or law firm; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

BGAN attempts to mitigate the conflicts of interest with the receipt of commissions if recommendations are implemented by providing you with these disclosures. Further, you are encouraged to consult other professionals and implement recommendations through other financial professionals.

D. As stated under Item 4, *Advisory Business* above, BGAN recommends other investment advisers (i.e., discretionary managers, third-party managers, and third-party service providers). BGAN and your advisory representative do not share in a portion of the advisory fees you pay to the third-party service providers. Fees paid to third-party service providers are separate from the fees paid to BGAN. BGAN's and your advisory representative's fee is in addition to the third-party manager fee. Some managers will calculate and deduct BGAN's and your advisory representative's fee from your account and remit the fees to BGAN.

Item 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics

A. BGAN has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. BGAN takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as BGAN's policies and procedures. Further, BGAN strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides you with BGAN's Privacy Policy. As such, BGAN maintains a code of ethics for its Advisory Representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, BGAN's Code of Ethics establishes BGAN's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

B. Neither BGAN nor its associated persons recommend clients buy or sell securities in which we have a material financial interest.

C. BGAN and its associated persons buy or sell securities identical to those securities recommended to you. Therefore, BGAN and/or its associated persons have an interest or position in certain securities that are also recommended and bought or sold to you. BGAN and its associated persons will not put their interests before your interest. BGAN and its associated persons cannot trade in such a way to intentionally obtain a better price for themselves than for you or other clients.

D. BGAN is required to maintain a list of securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

You have the right to decline any investment recommendation. BGAN and its associated persons are required to conduct their securities and investment advisory business in accordance with applicable Federal and State securities regulations.

Prohibition on Use of Insider Information
BGAN has adopted policies and procedures to prevent the misuse of "insider" information (i.e., material non-public information). A copy of such policies and procedures is available to any person upon request.

Item 12 - BROKERAGE PRACTICES

BGAN does not maintain custody of your assets, although we are deemed to have custody of your assets if you give us authority to withdraw our advisory fee directly from your managed account. Additionally, BGAN will be deemed to have custody in certain situations involving standing letters of authorization and if you give us authority to transfers funds or securities between your accounts. Your assets must be maintained in an account at a qualified custodian. Generally, a qualified custodian is a broker/dealer or bank.

BGAN participates in the institutional advisor program (the "Program") offered by Charles Schwab Institutional. Charles Schwab Institutional is a division of Charles Schwab & Co. ("Schwab"), member FINRA/SIPC. Schwab is an independent and unaffiliated SEC-registered broker-dealer. Schwab is offered as a custodian for U.S. based clients. Additionally, BGAN has a custodial arrangement with Interactive Brokers, LLC (IB) to enable expatriates who have U.S. based assets to participate in asset management services. Interactive Brokers has the ability to establish accounts for clients outside the U.S. for their U.S. based assets. Interactive Brokers, LLC is an independent and unaffiliated SEC-registered broker-dealer.

Schwab and IB offer to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from Schwab and IB through its participation in the Program. BGAN receives some benefits from Schwab and IB as further described below and under Item 14.

Schwab and IB will act solely as a broker/dealer and custodian and not as an investment adviser to you. Neither will have discretion over your account(s) and will act solely on instructions it receives from BGAN or you. Schwab and IB have no responsibility for our services and undertakes no duty to you to monitor our management of your account or other services we provide to you. Schwab and IB will hold your assets in a brokerage account and buy and sell securities and execute other transactions when BGAN or you instruct them to. To establish an account with Schwab and/or IB you will be required to enter into an account agreement directly with one or both entities. We do not open an account for you.

Not all investment advisers require you to maintain accounts at a specific broker/dealer. You can maintain accounts at another broker/dealer. However, the services provided by BGAN could be limited to only advice and will not include implementation. If you select another brokerage firm for custodial and/or brokerage services, it is likely you will not be able to receive asset management

services from BGAN. The ability to select another broker/dealer and custodian will depend on the ability for BGAN to obtain trade information and supervise the activities of its Advisory Representatives.

How We Select Brokers/Custodians

We seek to select a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- Ability to service you and us
- Combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- Capability to execute, clear and settle trades (buy and sell securities for your account)
- Capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of investment products made available (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 them
- Industry reputation, staying power as a company, financial strength and viability
- Technology and educational resources
- Confidentiality and security of your information

Best execution does not simply mean the lowest transaction cost. Therefore, no single criteria will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the currently utilized custodian.

There is an incentive for BGAN and the Advisory Representatives to recommend a broker/dealer over another based on the products and services that will be received rather than your best interest. Therefore, it is possible clients pay commissions higher than those charged by other broker/dealers in return for the products and services received by BGAN and/or its Advisory Representatives. The products and services BGAN and its Advisory Representatives receive from the broker/dealer or account custodian will be used to benefit all clients including those clients who elect to maintain their accounts elsewhere.

Aggregated Trading Procedure

When appropriate, your Advisory Representative will aggregate ("bunch") transactions in the same security on behalf of more than one client in an effort to strive for best execution and to possibly reduce the price per share and/or other costs to clients. However, aggregated or bunched orders will not reduce the transaction costs to participating clients. BGAN conducts aggregated transactions in a manner designed to ensure that no participating client is favored over another client. Participating clients will obtain the average price per share for the security executed that day. To the extent the aggregated order is not filled in its entirety and when possible, securities purchased or sold in an aggregated transaction will be allocated on a random basis. Under certain circumstances, the amount

of securities is increased or decreased to avoid holding odd-lot or a small number of shares for particular clients. This type of trading is not available on UK Pension assets.

Item 13 - REVIEW OF ACCOUNTS

A. If you are participating in the Asset Management program, or ongoing retirement plan consulting you will be invited to participate in at least an annual review or as agreed by you and your Advisory Representative. You may request more frequent reviews and set thresholds for triggering events that would cause a review to take place. Your Advisory Representative will monitor for changes or shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested, and market shifts and corrections.

If you are participating in Financial Planning and Consulting Services you will not receive regular reviews. BGAN recommends you have at least an annual review and update to any plans. However, the time and frequency of the reviews is solely your decision. Additionally, you will be charged review fees based on the fee schedule disclosed under the program. Other than the initial plan or analysis, there will be no other reports issued.

Your Advisory Representative that you have selected will conduct your account review. Please refer to your Advisory Representative's Form ADV Part 2B for important biographical information.

B. You must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require him review the portfolio allocation and make recommendations for changes.

C. You will be provided statements at least quarterly direct from US account custodians. Account custodians and platform providers offshore have different regulatory obligation that do not require them to provide quarterly statements. Valuations for UK pension transfer accounts are available upon request. Additionally, you will receive confirmations of all transactions occuring in US based accounts direct from the US account custodian.

Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION

A. Product and service vendors recommended by BGAN can provide monetary and non-monetary assistance with client events, provide educational tools and resources. BGAN does not select products solely based on monetary or non-monetary assistance. The selection of product is first and foremost. BGAN's due diligence of a product does not take into consideration any assistance it receives. To mitigate this conflict of interest this disclosure is provided.

<u>Pension Advice for United Kingdom and other Nationals or Expatriates</u>
As further described above under Item 5, BGAN and the advisory representative will receive compensation directly from the insurance bond provider if client elects to purchase an insurance bond rather than pay the initial planning and analysis fee for the pension transfer

advice. **Purchasing a bond wrapper will cost the client more over time and will directly affect the performance of the account over time. Further, the client will be subject to a surrender period of five to ten years.**

Solicitor or Introducer Arrangements

BGAN has entered into a solicitor agreement with another investment adviser to act in the capacity of a solicitor to refer certain clients to the investment adviser for advisory services and programs not offered by BGAN. As a result of referring a client to the investment adviser, BGAN will receive a portion of the advisory fee paid by the referred client. This is a conflict of interest since BGAN has a direct interest in the client engaging the investment adviser. A portion of the advisory fee received by BGAN will be paid to the BGAN Advisory Representative. Clients will be provided with a Solicitor Disclosure explaining the arrangement and the receipt of compensation and the effect on the amount of fee paid by the client as a result of BGAN sharing in a portion of the advisory fee. To mitigate this conflict of interest, BGAN is informing you of this relationship.

BGAN enters into solicitor/introducer agreements with non-U.S. based pension financial services firms, with which BGAN advisory representatives are affiliated to refer United Kingdom ("UK") expatriates or other nationals generally residing in the United States with UK based pension plans for advice on transferring to a SIPP. A description of this service is provided in Item 4 and Item 5 above. A portion of the advisory fee paid by clients to BGAN for transferring and managing their SIPP or QROPs will be paid to the pension financial services firm. Clients will be provided with a Solicitor/Introducer Disclosure which further explains the arrangement and the payment of fees. Clients will not be charged a higher fee as a result of payment of the introducer fee.

Additionally, BGAN enters into solicitor or introducer agreements with various non-U.S. financial service firms to offer its management services to their U.S. connected clients with U.S. assets including a previous employer 401k plan. BGAN shares a portion of the advisory representative's fee with the solicitor or introducer for a period not exceeding two (2) years. BGAN's fee is not increased as a result of BGAN sharing its fee with the solicitor or introducer. Solicitor or introducer arrangements vary and the incentive to the solicitor or introducer will vary.

The client is advised of the fees being paid to the solicitor or introducer and is given the opportunity to agree and authorize the payment of the fee by execution of the Solicitor/Introducer's Disclosure Statement. There is a conflict of interest for the client's non-U.S. advisor to refer clients to BGAN to manage their U.S. based assets because of the non- U.S. advisor's receipt of compensation from BGAN. Clients are under no obligation to authorize the payment of a solicitor or introducer fee. To mitigate these conflicts of interest, this disclosure and the Solicitor / Introducer's Disclosure Statement is provided.

As stated under Item 4 above, many Advisory Representatives are independent contractors. As such, the Advisory Representatives have a direct incentive in the advisory fees being charged since a portion of the advisory fee collected by BGAN will be paid to the Advisory Representative for compensation for advisory services. In other words, Advisory Representatives share in the fees charged to you by BGAN. Further,

clients are advised that the amount paid by BGAN to the Advisory Representative will be based on the production of the Advisory Representative. Therefore, the higher the assets under management by the Advisory Representative, the more compensation the Advisory Representative will receive. Consequently, since an advisory representative's assets under management are a basis for determining the Advisory Representative's payout, and since a portion of the advisory fees will be retained by BGAN, there is a conflict of interest for the Advisory Representative to charge the maximum fee as disclosed under Item 5 above and increase assets.

Charles Schwab Important Information

As disclosed under Item 12 above, Advisor participates in Schwab's institutional customer program and Advisor recommends Schwab to Clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to Schwab retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. Schwab offers from time to time to pay for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by Schwab through the program benefits Advisor but do not benefit its Client accounts. These products or services assist Advisor in managing and administering Client accounts, including accounts not maintained at Schwab. Other services made available by Schwab are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to Schwab. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a conflict of interest and indirectly influence the Advisor's choice of Schwab for custody and brokerage services.

Item 15 - CUSTODY

BGAN does not take custody of your funds or securities, except:

- BGAN will be deemed to have custody in certain situations involving standing letters of authorization and if you give us authority to transfers funds or securities between your accounts.
- BGAN will be deemed to have custody with the deduction of BGAN's advisory fees from your accounts.

Clients will receive account statements direct from the US based broker/dealer or US based account custodian reflecting the deduction of BGAN's advisory fee. Clients should carefully review statements received from the broker/dealer or account custodian. Further, clients should compare any written report received from BGAN with statements received direct from the broker/dealer or account custodian. Should there be any discrepancy the account custodian's report will prevail.

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct your account custodian to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person's account. Your account custodian maintains actual custody of your assets. You will receive account statements directly from your account custodian at least quarterly. They will be sent to the email or postal mailing address you provided. You should carefully review those statements promptly when you receive them.

Item 16 - INVESTMENT DISCRETION

Unless you specifically elect to have your account managed on a non-discretionary basis, your account will be managed on a discretionary basis. Discretionary authority authorizes BGAN and your Advisory Representative the authority to buy, sell, exchange and convert securities in your managed accounts and to engage, terminate, or replace Third-Party Service Providers. You will grant such authority by execution of the client advisory agreement. You may terminate discretionary authorization at any time upon receipt of written notice by BGAN.

Discretionary authority will be limited to BGAN and your Advisory Representative having the authority to determine the securities to be bought or sold for a client's account, the amount of securities to be bought or sold for a client's account, and the Third-Party Service Providers on your account.

Additionally, you are advised that:

1) You may set parameters with respect to when account should be rebalanced and set trading restrictions or limitations;
2) Your written consent is required to establish any mutual fund, variable annuity, or brokerage account;
3) With the exception of deduction of BGAN's advisory fees from the account, if you have authorized automatic deductions, BGAN will not have the ability to withdraw your funds or securities from the account.
4) BGAN will not have authority to remove or transfer funds or assets out of your account without your authorization with the exception of deduction of advisory fees from your account

Item 17 - VOTING CLIENT SECURITIES

BGAN does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact BGAN about questions you have and opinions on how to vote the proxies. However, the voting and how you vote the proxies is solely your decision.

Item 18 - FINANCIAL INFORMATION

A. BGAN will not require you to prepay more than $1,200 and six or more months in advance of receiving the advisory service.
B. As stated above, BGAN has discretionary authority over client accounts; however, that authority does not extend to the withdrawal of any client assets, with the exception of deduction of BGAN's advisory fees from your accounts.
C. Neither BGAN nor any of its Advisory Representatives have been the subject of a bankruptcy petition.

BEACON GLOBAL ADVISOR NETWORK, LLC'S PRIVACY NOTICE

BEACON GLOBAL
ADVISOR NETWORK

Updated as of December 31, 2024

Beacon Global Advisor Network, LLC ("BGAN") values our customers and makes it a top priority to safeguard the confidential information of our customers. We are committed to protecting your privacy and maintaining your trust and confidence.

BGAN collects information about you to assist us in providing services and products to help you meet your financial goals and objectives and provide high standards of customer service. Additionally, information is obtained from you in order to help us fulfill our legal and regulatory requirements. Information collected varies depending on the products and services requested and the scope of your engagement with us.

Facts	What does Beacon Global Advisor Network, LLC Do with Your Personal Information?
Why?	Beacon Global Advisor Network, LLC collects information about you to assist us in providing services and products to help you meet your financial goals and objectives and provide high standards of customer service. Additionally, information is obtained from you in order to help us fulfill our legal and regulatory requirements. Information collected will vary depending on the products and services requested and the scope of your engagement with us. Further, in providing financial services, the data is necessary for our legal and regulatory requirements and responsibilities and failing to provide information will result in discontinuance of services. Financial companies choose how they share your personal information. Federal and European Union law gives consumers the right to limit some but not all sharing. Federal and European Union law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect can include: ● Social Security number ● Income ● Assets ● Personal information (address, date of birth, net worth, income) ● Account numbers and information ● Financial Information ● Insurance, health, and medical information **We have an obligation to ensure that your personal information is accurate and up to date. Please contact us promptly to correct or remove any information that you think is incorrect.**

	Use of our website. Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We use your information collected from the website to personalize your repeat visits to the site. Additionally, we use cookies to track visitor use of the website and to compile statistical reports on website activity. For further information visit http://www.allaboutcookies.org/. You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features do not function as a result. *Information about connected individuals.* We may need to gather personal information about your close family members and dependents in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We'll provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them. *No longer our customer.* When you are no longer our customer, we will continue to hold your information and share it as described in this notice.
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons why financial companies can share their customers' personal information, the reasons Beacon Global Advisor Network, LLC chooses to share personal information and whether you can limit this sharing. Where third parties are involved in processing your data we'll have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they will maintain the security and confidentiality of your information. When and where necessary for us to transmit or deliver your personal information to a third party, we will use appropriate security measures to protect your personal information in transit. Such methods can include the use of password protection, data encryption, and secured portals.

Reasons We Can Share Your Personal Information	**Does Adviser share?**	**Can you limit this sharing?**
For our everyday business purposes, such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus.	Yes	No
To fulfill our obligations to aid in the prevention of money laundering and other financial crimes we send your personal information to third party agencies for identity verification purposes.	Yes	No
For our marketing purposes to offer our products and services to you.	Yes	Yes

For joint marketing with other financial companies.	Yes	Yes

Reasons We Can Share Your Personal Information	**Does Adviser share?**	**Can you limit this sharing?**
For our affiliates' everyday business purposes—information about your transactions and experiences. We share information about our customers to process transactions, maintain your account(s), or respond to court orders and legal investigations.	Yes	No
For our affiliates' everyday business purposes—information about your creditworthiness.	No	NA
For non-affiliates' everyday business purposes to assist us in obtaining business or providing account maintenance or customer service to your account(s).	Yes	No
For our affiliates to market to you—to offer new products or services to you.	No	NA
For nonaffiliates to market to you—we do not sell, share, or disclose your nonpublic personal information to nonaffiliated third-party marketing companies.	No	NA
For advisory representatives who leave Beacon Global Advisor Network, LLC If your advisory representative leaves Beacon Global Advisor Network, LLC to join another investment adviser or other financial institution, the advisory representative retains copies of your personal information so that he or she can continue to serve you at the new firm. In doing so, your advisory representative shares your information with the new firm but is otherwise required to keep confidential the personal information obtained from you while the advisory representative was affiliated with Beacon Global Advisor Network, LLC, and he or she may use it only to service your account(s). **Please note:** Certain states and countries require affirmative consent to allow sharing. See below for more on your rights under state law. **In the event that a Beacon Global Advisor Network, LLC advisory representative terminates his or her relationship with Beacon Global Advisor Network, LLC, and you want to follow your advisory representative to his or her new firm, please do not request to limit our sharing.**	Yes	Yes

Who We Are	
Who is providing this notice?	**Beacon Global Advisor Network, LLC**

What We Do	
How does Beacon Global Advisor Network, LLC protect my personal information?	Beacon Global Advisor Network, LLC recognizes the need to prevent unauthorized access to the information we collect, including information held in electronic format, and we protect your personal information in the following ways: • Computer safeguards and secured files and buildings. • We only grant access to your personal information to parties with whom we have executed confidentiality/nondisclosure agreements and who need that information to serve you or to assist us in conducting our operations. • We have physical and electronic safeguards in place to ensure that we comply with our own policy, industry practices, federal and state regulations, and

	European Union law. • Our employees are trained in the proper handling of sensitive information.
How does Beacon Global Advisor Network, LLC collect my personal information?	We collect your personal information, for example, when you: ● Open an account ● Enter into an investment advisory account ● Apply for insurance ● Tell us about your investment or retirement portfolio ● Seek advice about your investments We also collect your personal information from others such as credit bureaus, affiliates or other companies.
Why can't I limit all sharing?	Federal and European Union law give you the right to limit only: ● Sharing for affiliates' everyday business purposes—information about your creditworthiness ● Affiliates from using your information to market to you ● Sharing for non-affiliates to market to you State laws, European Union Law, and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.
Marketing	We would like to send you information about our products and services which may be of interest to you. If you are a European Union citizen and have agreed to receive marketing information, you may opt out at a later date by contacting us by one of the methods below. You have a right at any time to stop us from contacting you for marketing purposes or providing your information to other associated Companies. If you no longer wish to be contacted for marketing purposes, please contact us using the contact information below.

How Long We Maintain Your Information

During the course of our relationship with you we'll retain personal data which is necessary to provide services to you. We will take all reasonable steps to keep your personal data up to date throughout our relationship. Additionally, we are subject to regulatory requirements requiring us to retain your data for a specified minimum period, which is generally five years from the date you cease being our customer: This minimum period is the period during which we have a legal obligation to retain your records. Additionally, we reserve the right to retain data for a longer period where we believe it is in our legitimate interests to do so. In any case, we will not keep your personal data for longer than seven years after our relationship with you has ended. You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

How You Can Access Information We Hold About You

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please contact us using the contact details noted below. When your personal data is processed by automated methods you have the right to ask us to move your personal data to another organization for their use.

To Limit Our Sharing and Your Rights
• Call Beacon Global Advisor Network, LLC at 888-679-6474 • Mail your request to: One Glenlake Parkway, Suite 650, Atlanta, GA 30328 If you are a European Union citizen, you also have a right to lodge a complaint with the supervisory authority for data protection. However, in the first instance please contact the Beacon Global Advisor Network, LLC Compliance Department at: One Glenlake Parkway, Suite 650 Atlanta, GA 30328 888-679-6474
Any changes we make to this policy in the future will be posted on our website and an updated version of this Privacy Notice will be provided to you so that you are always aware of how we use your Personal Data.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies.
Non-Affiliates	Companies not related by common ownership or control. They can be financial and non-financial companies.
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. This may include banks, credit unions, or other financial institutions with which we have a joint marketing agreement.

Other Important Information

Website. Our website contains links to other websites. This privacy policy only applies to our website. Therefore, when you link to other websites you should read their privacy policies and our privacy policy does not extend to any other vendor, company, or third party linked to from our website.

If you live in an "opt-in" state, where we are required to obtain your affirmative consent to share your nonpublic personal information with nonaffiliated third parties who do not currently assist us in servicing your account or conducting our business, your advisory representative is required to obtain your consent before your advisory representative can take your information with him or her should your advisor leave Beacon Global Advisor Network, LLC

Information for California, North Dakota, and Vermont Customers
In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.

Information for New Jersey Clients
The New Jersey Bureau of Securities ("Bureau"), an arm of the Office of the New Jersey Attorney General, is

charged with protecting investors from investment fraud, and regulating the securities industry in New Jersey. In addition to bringing investigative and enforcement actions against firms or individuals who violate the New Jersey Uniform Securities Law and regulations thereunder, the Bureau registers securities offered or sold in New Jersey and oversees the firms and individuals selling securities or providing investment advice to or from New Jersey.

Investors can contact the Bureau to research the professional background of current and former registered broker-dealers, investment advisers, agents, and investment adviser representatives. **To research a financial professional, contact the Bureau via phone at 1-866-I-Invest (within New Jersey) or at 973-504-3600 (both within and outside New Jersey) or via email at njbos@lps.state.nj.us**.

Investors can also file complaints with the Bureau against individuals and firms selling securities or offering investment advice, as well as companies issuing securities investments directly.

To file a complaint or learn more about the Bureau, visit the Bureau's website at www.NJSecurities.gov.