



## Conflicts for both KIS and your financial professional

### Training and education

We work closely with many issuers, wholesalers, and product and service providers who provide training and education meetings for our financial professionals. These meetings or events are held to educate financial professionals on investment features and characteristics, business building ideas, successful sales techniques, suitability, and various other topics. In addition, certain third parties provide free or discounted research or other products and services, which can assist our financial professionals with providing services to you.

We offer multiple ways for product and service providers to provide training and education to our financial professionals. This training and education may be offered in branch offices or in larger group settings, including at the national level. Certain product and service providers have agreed to dedicate resources and funding to provide this training and education at our nationally organized events. This commitment could lead our financial professionals to focus on, and recommend to you, the products offered from these providers versus the products offered by families not providing this level of training and education support. We select the product and service providers that participate in the training and education events based on a variety of qualitative and quantitative criteria. The subset of these families that offer this support and participate in national organized training and education events may change periodically.

Likewise, from time to time, issuers will reimburse us for expenses incurred by individual branch offices in connection with conducting training and educational meetings, conferences, or seminars for our financial professionals and customers. Also, financial professionals may receive promotional items, meals or entertainment, or other noncash compensation from product providers. Financial professionals may receive a maximum value of \$100 worth of gifts from each product provider per year. In addition, our financial professionals may receive reasonable meals and business entertainment from product providers.

Although training and education compensation is not related to individual transactions or assets held in customer accounts, it is important to understand that, due to the total number of product providers whose products are offered by us, it is not possible for all companies to participate in a single meeting or event. Consequently, those product providers that do participate in training or educational meetings, seminars, or other events gain an opportunity to build relationships with our financial professionals; these relationships could lead to recommendations to you and sales of that particular company's products.

We receive varying amounts of training and education compensation from companies. The training and education compensation for centrally organized events and vendor products or services may vary from \$25,000 to \$50,000 per company annually. We receive significant moneys from several vendors so that we can put on a sales and product training symposium annually for a select group or all of our financial professionals. There are also some companies that do not provide any training and education compensation to us.

2021 Sales Meetings	
Lockwood Advisors	\$37,570.62

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## Marketing allowance

KIS also asks certain general mutual fund companies, insurance agencies, and insurance companies whose products we sell to make additional payments. We typically receive additional payments in the form of a percentage-based fee of up to 0.25% of your total purchase amount (which would be \$25 on a \$10,000 investment) on sales of equity fund shares or insurance contracts and up to 0.15% (which would be \$15 on a \$10,000 investment) on sales of fixed income fund shares, and you pay these expenses indirectly because they are built into the cost of the insurance product. After the first year, these payments typically would be up to 0.05% (which would be \$5 on a \$10,000 investment) every year while you own your shares. Some insurers or fund companies may calculate this on a total amount of assets under management in their policies sold by KIS. Some mutual funds may compensate us by paying a fixed dollar amount (typically \$6 or less per account) for administrative and recordkeeping services. Some funds pay both a percentage-based fee and a fixed dollar amount fee.

These amounts would be in addition to any service fees or 12b-1 fees that KIS receives. The payments typically come from the distributor, investment adviser, insurance company, or another entity related to the fund and, in that case, they would not increase your cost as an investor. However, some mutual funds may consider part or all of these payments to be part of the fund's normal operating expenses and pay them from the fund's assets, which means that you pay these expenses indirectly. The fund's prospectus may not specifically describe these additional fees as service fees or identify them separately from other expenses of the fund.

2021 Revenue Sharing	
Allianz Life	\$194,013.11
AXA Equitable	\$120,898.15
Brighthouse Services	\$296,565.71
Forethought	\$143,123.65
Jackson National	\$170,018.06
Nationwide Life	\$79,083.58
New York Life	\$35,251.41
Pacific Life	\$93,423.68
Principal Life	\$12,722.88
Security Benefit	\$180,313.92

2021 Persistency Bonus	
Symetra	\$143,595.65
W&S Financial	\$53,963.41

## Key Investment Services



Investment products are offered through Key Investment Services LLC (KIS), member FINRA/SIPC and SEC-registered investment advisor. Insurance products are offered through KeyCorp Insurance Agency USA, Inc. (KIA). KIS and KIA are affiliated with KeyBank National Association (KeyBank).

Investment and insurance products made available through KIS and KIA are:

NOT FDIC INSURED • NOT BANK GUARANTEED • MAY LOSE VALUE • NOT A DEPOSIT • NOT INSURED BY ANY FEDERAL OR STATE GOVERNMENT AGENCY

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