BENJAMIN F. EDWARDS®
INVESTMENTS *for* GENERATIONS®

Revenue Sharing Disclosure

Introduction

Benjamin F. Edwards ("BFE" or "the Firm") and its financial advisors are compensated for providing products, services and advice in a number of ways, including the agreed upon advisory fees, brokerage commissions and other fees charged directly to clients as well as through other payments and revenue received from, or paid by, third parties.

For example, BFE receives payments and incentives from certain product and platform providers (collectively referred to as "strategic partners") that are designed to compensate BFE for its marketing and educational efforts associated with the sales of the products, conducting product due diligence, or for offsetting operational expenses of the Firm.

Except for the scenarios described in the Event Sponsorships and Non-Cash Compensation sections below, BFE financial advisors do not receive additional cash compensation or benefits because of these arrangements. However, we want our clients to understand that revenue sharing and other payments and incentives create a conflict of interest for the Firm and financial advisors because the additional financial incentives give the Firm and financial advisors a reason to recommend products and providers that make such payments, even when lower-cost providers and products, including lower-cost share classes of the same product, are available and can be recommended to you.

BFE believes it is important for clients to understand BFE's revenue sharing and other third-party compensation arrangements so that clients can make informed decisions whether to participate in BFE's programs. The various forms of these payments and incentives are described in more detail below.

Product Providers

BFE makes various investment products available to its clients including mutual funds, variable insurance products and variable annuities. BFE has entered into revenue arrangements with certain providers of these products based on assets or sales of their products in BFE's brokerage program. BFE does not receive revenue from product providers based on assets or sales within our investment advisory programs. The specific types of revenue received from product providers are outlined below.

Contractual Revenue Sharing Arrangements

BFE has entered contractual revenue sharing arrangements with certain mutual fund companies. These fees are not charged directly to clients; rather, mutual fund companies pay BFE based on a percentage of the value of their mutual fund brokerage assets held with BFE, or for new sales of their products in BFE's brokerage accounts. Such payments are typically referred to as asset-based fees.

BFE has arrangements with several mutual fund companies to pay asset-based fees that range from 4 to 6.5 basis points (0.04% - 0.065%) on the value of the average assets held. To illustrate how this works, if a client invests $10,000 in a mutual fund in which BFE has a revenue sharing arrangement in place for 6.5 basis points and holds it for a year (assuming the value of the investment remains unchanged), BFE would be paid $6.50 (or 0.065 x $10,000) by the mutual fund company for that year.

Because BFE receives these revenue sharing payments in brokerage accounts without regard to the share class in which the client invests, the Firm has a structural incentive, firm-wide, to recommend funds that make such payments over others that do not make similar payments, even though other lower-cost funds that have the same, or similar, investment strategies are available and can be recommended to you.

Separately, BFE has an arrangement with at least one mutual fund company to receive a fee of 8 basis points (0.08%) for new sales in BFE's brokerage accounts. This sales-based agreement entitles BFE to receive a payment of 0.08% of the value of all sales of a mutual fund company's products in BFE's brokerage accounts. This arrangement creates the same type of conflict of interest as is associated with product-related asset-based compensation.

The product providers with which BFE has executed a revenue sharing arrangement are listed in the Strategic Partners Revenue Sharing Summary at the end of this document.

Internal Product Expenses

All mutual funds and variable annuities charge internal fees and, over time, even a small difference in these internal expenses can have a significant effect on the client's overall return. One fee associated with mutual funds and variable annuities is commonly referred to as a "12b-1 fee," named after the securities industry rule that establishes parameters by which such fees may be charged and paid. 12b-1 fees are charged directly to clients on a recurring basis as part of the internal operating expenses of the fund. Because of this, 12b-1 fees will directly impact a client's overall investment returns.

12b-1 fees are then paid to securities firms such as BFE out of the fund's assets to cover some of the cost of marketing and selling the fund, to pay for certain mutual fund shareholder services and sometimes to pay mutual fund company employee bonuses.

The amount of 12b-1 fees varies from product to product, although they generally range from 15 - 25 basis points for a mutual fund's class A shares to 100 basis points, or 1%, for class C shares. 12b-1 fees relating to holdings in BFE brokerage accounts are shared with BFE and our clearing firm. These fees are typically paid as a percentage of the mutual fund assets that are held at BFE.

In its advisory programs, BFE takes steps to ensure that either the share classes of mutual funds it recommends to clients do not include a 12b-1 fee, or that the 12b-1 fee will be rebated to the client's account.

BFE's receipt of 12b-1 fee compensation for assets held in its brokerage accounts thus creates the incentive for the Firm to recommend those funds over others that do not make similar payments, even though other lower-cost funds that have the same, or similar, investment strategies are available and can be recommended to you.

Platform Providers

BFE has engaged its clearing firm, Pershing, LLC (Pershing), to provide various services, including but not limited to execution, clearing, custody and other services. For these services, Pershing charges BFE which in turn charges its clients. In some cases, BFE increases these fees before passing the fee along to clients. In this case, BFE retains the difference to assist in covering the operational costs of the firm.

As part of a separate compensation arrangement, Pershing reimburses BFE for certain infrastructure and operational expenses which assists BFE in growing its brokerage and investment advisory asset base. The current arrangement is anticipated to continue at least through December 2022, although the agreement can be periodically revisited in the intervening time based on mutual agreement of the parties. Partially because of these reimbursements, BFE has an incentive to continue using Pershing as its clearing firm and custodian through at least December 2022, even if other clearing firms and custodians can provide superior and/or less expensive brokerage and custody services to BFE advisory clients and brokerage customers.

Pershing also reimburses BFE for certain documented account transfer fees if BFE credits a client account for fees charged by a client's prior firm at the time the account transferred to BFE. Such reimbursements typically occur during a limited period after an advisor first joins the firm. Transfer fee reimbursements occur for both brokerage and advisory accounts. This arrangement assists in incentivizing a client to move to BFE, where the client has been charged a transfer fee by their previous firm. In cases where a BFE client does not incur a transfer fee, Pershing will not make payment to BFE. Because Pershing pays these reimbursements to BFE's clients, BFE has an incentive to continue using

Pershing as its clearing firm and custodian, even if other clearing firms and custodians can provide superior and/or less expensive brokerage and custody services to BFE advisory clients and brokerage customers.

Pershing also sponsors FundVest®, a service that aggregates multiple mutual fund companies onto a single platform that makes it easier for BFE financial advisors to identify and select those mutual fund companies to recommend to clients. BFE permits the use of FundVest® or non-FundVest® mutual funds in BFE brokerage accounts. However, the enhanced product visibility, together with the ready availability of research and product support for products on the FundVest® platform, make it more desirable for BFE or its financial advisors to employ those products in its brokerage program.

Additionally, mutual fund companies pay Pershing for this visibility and, in turn, Pershing shares a portion of those payments with BFE. The payments are made to BFE in accordance with an asset-based formula based on the value of a given mutual fund's brokerage assets held at BFE; BFE does not receive FundVest® compensation in connection with assets held in BFE's advisory programs. This creates an incentive for the Firm to recommend funds on the FundVest® platform over others that do not make similar payments, even though other lower-cost funds that have the same, or similar, investment strategies are available and can be recommended to you when purchased away from the FundVest® platform.

The platform providers with which BFE has executed a revenue sharing arrangement are listed in the Strategic Partners Revenue Sharing Summary at the end of this document.

Third-Party Money Managers

When a client participates in the Benjamin F. Edwards Separately Managed Portfolios advisory program, the client will pay a single wrap fee that covers all charges including but not limited to trading, clearing & custody, reporting, advice and the costs of the third-party money manager that has been selected.

Some third-party money managers (Managers) charge less than others for similar strategies. In cases where the advisor recommends a lower cost Manager but does not pass the relative discount on to the client, BFE and the advisor will earn more than if a costlier manager was selected. This is because the advisor and BFE retain the difference of the client's overall wrap fee after the cost of the manager has been deducted. While the recommendation of a Manager is not made solely based on the cost of the Manager, a conflict of interest does exist in that BFE and/or the advisor have an incentive to recommend lower cost money managers.

Some third-party money managers charge less than others for similar strategies. BFE has a conflict of interest when evaluating and recommending money managers to the client because the Firm has an incentive to recommend money managers that charge BFE lower fees, as the Firm retains the difference between the client's wrap fee and the cost of the third-party manager, even though other third-party managers might have better investment performance.

Similarly, BFE actively negotiates with third-party money managers in order to receive the most favorable rates for the Firm, and also routinely seeks to find other ways to reduce costs or become more efficient in ways that will reduce BFE's operating costs. However, if the cost of administering the Separately Managed Portfolios program decreases as a result of such negotiations, or implementing such efficiencies, the client's wrap fee is not reduced, and BFE will retain the savings.

Cash Sweep Option / Insured Deposit Program

Clients in both brokerage and investment advisory programs have several choices for how to invest cash balances. Money market mutual funds are one option and investors should be aware that these funds present the same conflicts of interest for BFE as other mutual fund products described in the Product Providers section above.

BFE also offers an FDIC-insured bank deposit program, which sweeps cash held within accounts into an interest-bearing FDIC insured cash account or money market funds. In this program, BFE, Pershing and the Insured Deposit Program sponsor earn fees based on the amount of money invested in the program. Clients are entered into this program by default at the time of account opening but may withdraw from the program at any time by contacting their financial advisor.

BFE, Pershing, and the program sponsor can earn higher fees when money is invested in the Insured Deposit

Program than in other short-term cash alternative products. This means BFE has a conflict of interest because it has an incentive to recommend investment in this program over money market mutual funds, or in other short-term money management products or products with the potential for higher returns.

The Insured Deposit Program sponsor establishes the parameters in which BFE participates in its program. Essentially, BFE earns its compensation by retaining any residual interest after the initial yield that was paid by the participating banks for the client deposits has been reduced by the fees payable to Pershing and to the program sponsor, and the rate paid to the client.

The fees paid to Pershing and the Insured Deposit Program sponsor are established at the outset. BFE is given the latitude to determine the final interest rate that will be earned by the client. Because BFE's compensation is earned from the residue, it effectively determines its own compensation, within the limits of the initial market yields that are paid. While BFE must pay a competitive rate to clients in order to retain their business, BFE has a conflict of interest in establishing that rate because the firm's compensation will be greater if the client's final yield is lower. BFE does not have this type of conflict in connection with money market funds, and as a result customers and clients can earn more interest if they choose a money market fund over the Insured Deposit Program as their cash sweep vehicle.

Interest rates earned by clients in connection with the Insured Deposit Program at any given time will vary and are derived from then current market yields paid by the participating banks. The interest rate earned by a given client is also a function of the linked value of all of the assets invested by a client in different accounts at Benjamin F. Edwards. In general, a client with greater linked balances will receive an interest rate at a higher tier than a client with lower linked balances. The aggregate value of a client's linked balance will determine which interest rate tier in which a client is placed. In connection with the Insured Deposit Program, BFE will determine the amount of invested assets that is required for each interest rate tier, as well as the interest rate to be paid at each tier. Because BFE's compensation is earned from the residue, the tiered compensation structure results in BFE receiving less compensation when more of a given client's assets are invested with Benjamin F. Edwards. Consequently, BFE and its advisors have an incentive to recommend products other than the FDIC insured bank deposit product to clients with higher balances in the program, even when the FDIC insured product might be more advantageous.

The revenue BFE derives from this program fluctuates due to the amount of cash invested and due to changes in market interest rates. As a point of reference, as of July 1, 2021, BFE earned approximately $0.92 per $1,000 invested in the program annually from client deposits in both brokerage and advisory accounts. For additional detail, please review the Insured Deposit Program Terms and Conditions.

Because BFE establishes the client's final earned interest rate in the Insured Deposit Program and the threshold values of the Program's linked account tiers, it directly influences the amount the client will earn and the revenue BFE retains. It is important for clients to understand this conflict so they can make informed decisions when evaluating the benefits of participating in the Insured Deposit Program versus other cash-sweep alternatives.

Asset-Based Loans

BFE offers its clients the option of obtaining an asset-based loan using the assets in their existing account(s) as collateral. Clients may obtain a "non-purpose" loan (the proceeds of which may be used for any purpose other than purchasing securities) or a "margin" loan (the proceeds of which can be used to purchase securities).

BFE works with Pershing to facilitate margin loans. BFE and Pershing review the margin agreement and any other documents that Pershing may require for clients to obtain the margin loan. When clients obtain a non-purpose loan, BFE works with intermediary banks that in turn lend funds to BFE clients. For either loan type, BFE clients will pay interest on the borrowed funds, of which a portion is used to compensate the intermediary bank or Pershing and a portion is retained by BFE.

BFE also has the ability to markup, or increase, the interest rates charged to its clients. BFE has a conflict of interest with its clients because BFE receives cash compensation when clients choose to obtain an asset-based loan. BFE is incentivized to recommend asset-based loans to clients and to urge clients to increase the amount borrowed. While BFE strives to offer competitive interest rates so it can retain its clients' business, it also has a conflict of interest to increase the interest rates charged to clients for asset-based loans because the firm's compensation will be greater. It is important for clients to understand these conflicts so they can make informed decisions on whether to obtain asset-based loans from BFE. Clients should also carefully consider the applicable loan's terms and conditions and/or specific disclosures, which highlight the risks associated with borrowing funds using the collateral in a brokerage or advisory account.

Event Sponsorships

Both product providers and platform providers help offset the costs associated with BFE-sponsored motivational, training or educational symposia for financial advisors and clients, as well as other events presented by BFE. These payments are made to BFE in lump sum amounts for reimbursements of the particular expenses associated with these events. In exchange for these payments, the sponsoring vendors typically have an opportunity to make a presentation to, and otherwise network with, BFE's advisors and other personnel who are in attendance. This gives products offered by the sponsor greater visibility within the Firm's advisor network, making it more likely that products offered by sponsors will be recommended by the advisors.

BFE receives event sponsorship payments that incentivize sales of products in both brokerage and advisory accounts. In calendar year 2021, individual event sponsors' payments to BFE ranged from approximately $30,000 – $200,000. Sponsors that have contributed to events for BFE or BFE's financial advisors are listed in the Strategic Partners Revenue Sharing Summary at the end of this disclosure.

While not directly tied to specific client holdings or sales, event sponsorship payments by product and platform providers are motivated by a recognition of BFE's sales and holding of their products, as well as a desire for BFE to make and improve future sales. BFE has a conflict of interest because the Firm or its advisors are incentivized to recommend products or services of product and platform providers that provide event sponsorship payments even if similar products offered by other vendors are less expensive or otherwise better meet their clients' needs.

Non-Cash Compensation

Non-cash compensation includes benefits and incentives that have value but are not received by BFE or its advisors in the form of direct cash payments. Such non-cash compensation may be given in connection with both brokerage and investment advisory business activity.

For example, some product vendors, money managers, or service providers make gifts or provide business entertainment, such as meals, or tickets to theatrical, sporting or other events, to BFE or its financial advisors.

BFE's financial advisors also attend educational events hosted and paid for by vendors, and vendors reimburse financial advisors for the cost to travel to these events as well as for the cost of meals and lodging at such events. These events give products offered by the event sponsor greater visibility within the Firm's advisor network, making it more likely that products offered by sponsors will be recommended by the advisors.

In some cases, financial advisors must qualify for BFE-sponsored events by achieving certain overall revenue or growth goals. In addition, financial advisors seeking to qualify for vendor-sponsored events and trips generally do so by attaining certain levels of sales of products of those vendors.

While BFE financial advisors do not receive product specific financial compensation incentives, this non-cash compensation creates a conflict of interest for BFE and its financial advisors by creating an incentive to recommend the products of vendors that provide and pay for the various functions and events they attend, even if similar products offered by other vendors are less expensive or otherwise better meet their clients' needs.

Conclusion

The foregoing discussion of the various compensation arrangements in which BFE participates is provided to help clients as they consider what products or services they wish to purchase and are intended to promote healthy conversation with the client's financial advisor about conflicts of interest and the ways they are handled by the firm.

Strategic Partners Revenue Sharing Summary

Product Providers					
Mutual Funds Companies					
Franklin Templeton*+		Legg Mason*+		Russell*	
The Insured Deposit Program					
Pershing			Total Bank Solutions		

* BFE receives a percentage of asset-based fees on brokerage assets; advisory assets are excluded

+ BFE receives a percentage of sales-based fees on brokerage sales; sales in advisory accounts are excluded

Platform Providers	
Pershing	FundVest®*

* BFE receives a percentage of asset-based fees on brokerage assets; advisory assets are excluded

2021 Event Sponsors		
American Funds	Confluence	Dearborn
First Trust	Franklin Templeton	Jackson
Lincoln	MetLife/BrightHouse	Pershing
Russell		