

AET Investment Services, LLC

This Regulation Best Interest (“Reg BI”) Disclosure provides information about AET Investment Services, LLC (“AET IS”, “us”, “our” or “we”). If you have any questions about the contents of this Reg BI Statement, please contact us at (702) 534-4585 or emails us at: support@aetbd.com. This Reg BI Statement is applicable to retail customers for whom we are acting as broker.

This Reg BI Statement provides information regarding the material facts relating to the scope and terms of our relationship with you, including the capacity in which we and our registered representatives act; the material fees and costs that apply to your transactions, holdings, and accounts; the type and scope of services we provide, including any material limitations on the securities or investment strategies involving securities we recommend; the basis for and risks associated with our recommendations; and material facts relating to conflicts of interest associated with our recommendations.

For additional information regarding AET IS and its brokerage services, or your brokerage account, please see the Form CRS for AET IS at <https://aetbd.com/disclosures.html#customer-relationship-summary>.

For additional free information regarding AET IS, including disciplinary events, please visit www.investor.gov and <https://brokercheck.finra.org>.

General Information Regarding AET IS

AET IS is registered with the Securities and Exchange Commission (“SEC”) as a broker-dealer and is a member of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”). AET IS is a wholly owned subsidiary of AET Holdings, LLC.

Brokerage Services:

When you establish a brokerage account with us, you have the ability to buy, sell and hold investments within your account. We execute purchases and sales as directed by you. In a brokerage services relationship, we can trade with you for our own account, for an affiliate or for another client, and we can earn a profit on those trades. The capacity in which we act is disclosed on your trade confirmation. However, we are not required to communicate it in advance, obtain your consent, or inform you of any profit earned on trades.

Cash Brokerage Accounts

We provide brokerage services through a cash brokerage account. We do not offer margin brokerage accounts. In a cash brokerage account, you must pay for your purchases in full at the time of purchase.

Brokerage Account Types

We offer many different self-directed brokerage account types including individual and joint accounts, custodial accounts, estate and trust accounts, partnership accounts, individual retirement accounts and other types of retirement accounts as outlined in our account agreement(s). You should refer to our account agreement(s) for more information concerning available account types. Brokerage accounts are only offered to clients that hold trust accounts at American Estate & Trust, Inc. (“AET”).

Incidental Brokerage Services, Recommendations and Account Monitoring

Within your brokerage account, we may also provide other incidental services such as custodian reports and account information. We will not make securities recommendations to you for investments in your brokerage account, but we may make recommendations to you regarding private placements that are offered through AET IS. If you purchase a private placement it will be held in an account at our affiliate American Estate & Trust (“AET”) or at the custodian of your choice but will not be held in your brokerage account.

When we make a securities recommendation the recommendation is made in our capacity as a broker-dealer unless otherwise stated at the time of the recommendation. Any such statement will be made orally to you. Moreover, when we act in a brokerage capacity, we do not agree to enter into a fiduciary relationship with you.

It is important for you to understand that when our registered representatives make a brokerage recommendation to you, we are obligated to ensure the recommendation is in your best interest, considering reasonably available

alternatives, and based on your stated investment objective, risk tolerance, liquidity needs, time horizon, financial needs, tax status, and other financial information you provide us. You may accept or reject any recommendation. It is also your responsibility to monitor the investments in your brokerage account, and we encourage you to do so regularly. We do not commit to providing on-going monitoring of your brokerage account.

Please also consider that from time to time we may provide you with additional information and resources to assist you with managing your brokerage account or private placement. This may include but is not limited to educational resources, sales and marketing materials. When we offer these services and information, we do so as a courtesy to you. These activities are not designed to monitor specific investment holdings in your brokerage account, they do not contain specific investment recommendations about investment holdings, and you should not consider them a recommendation to trade or hold any particular securities in your brokerage account.

Clearing Services

We have entered into an agreement with Apex Clearing Corporation (“Apex”) to carry your account and provide certain back-office functions. We and Apex share responsibilities with respect to your account as set forth in the Client Account Agreement that was delivered to you upon opening of your account. Please refer to the Client Account Agreement for more information on how such responsibilities have been allocated between us.

Understanding Risk

It is important for you to understand that all investment activities involve risk, including the risk that you may lose your entire principal. Further, some investments involve more risk than other investments. Higher-risk investments may have the potential for higher returns but also for greater losses. The higher your “risk tolerance,” meaning the amount of risk or loss you are willing and able to accept in order to achieve your investment goals, the more you may decide to invest in higher-risk investments offering the potential for greater returns. We align risk tolerances with investment needs to offer you different investment objectives from which to choose (see below). You should select the investment objective and risk tolerance best aligned with your brokerage account goals and needs.

Investment goals typically have different time horizons and different income and growth objectives. Generally, investment goals are on a spectrum, with “Income” investors typically holding the smallest percentage of higher- risk investments, followed by “Growth and Income” investors holding *some* higher-risk investments, and finally “Growth” investors holding a significant portion of their portfolio in higher-risk investments. Risk tolerance also varies and we measure it on a continuum that increases from “Conservative” to “Moderate” to “Aggressive,” and finally “Speculation.” See the chart below for details.

Investment Objective	Investment Objective Description	Risk Tolerance	Risk Tolerance Definition
Income	Income portfolios emphasize current income with minimal consideration for capital appreciation and usually have less exposure to more volatile growth assets.	Conservative	Conservative Income investors generally assume lower risk but may still experience losses or have lower expected income returns.
		Moderate	Moderate Income investors are willing to accept a modest level of risk that may result in increased losses in exchange for the potential to receive modest income returns.
		Aggressive	Aggressive Income investors seek a higher level of returns and are willing to accept a higher level of risk that may result in greater losses.
Growth & Income	Growth and Income portfolios emphasize a blend of current income and capital appreciation and usually have some exposure to more	Conservative	Conservative Growth and Income investors generally assume a lower amount of risk but may still experience losses or have lower expected returns.
		Moderate	Moderate Growth and Income investors are willing to accept a modest level of risk that may result in increased losses in exchange for the potential to receive modest returns.

	volatile growth assets.	Aggressive	Aggressive Growth and Income investors seek a higher level of returns and are willing to accept a higher level of risk that may result in greater losses.
Growth	Growth portfolios emphasize capital appreciation with minimal consideration for current income and usually have significant exposure to more volatile growth assets.	Conservative	Conservative Growth investors generally assume a lower amount of risk but may still experience increased losses or have lower expected growth returns.
		Moderate	Moderate Growth investors are willing to accept a modest level of risk that may result in significant losses in exchange for the potential to receive higher returns.
		Aggressive	Aggressive Growth investors seek a higher level of returns and are willing to accept a high level of risk that may result in more significant losses.
Speculation	Speculation investors seek out a maximum return through a broad range of investment strategies which generally involve a high level of risk, including the potential for unlimited loss of investment capital.		

Our recommendations are based in part on your risk tolerance and investment objective as outlined above. We encourage you to carefully consider your investment objective and risk tolerance before investing.

FDIC-Insured Sweep Program

Our brokerage services include a FDIC-Insured Sweep Program. This program permits you to earn a return on uninvested cash balances in your brokerage account by allowing cash balances to be automatically “swept” into a “Cash Sweep Vehicle,” until such balances are otherwise required to satisfy obligations arising in your account. These Cash Sweep Vehicles include interest-bearing deposit accounts, and if permissible, money market mutual funds or other sweep arrangements made available to you. You will receive additional information concerning the FDIC-Insured Sweep Program in your New Account Agreement. More information about the FDIC-Insured Sweep Program can be found in the Apex FDIC-Insured Sweep Program Terms and Conditions available at <https://apexfintechsolutions.com/legal/disclosures/>. Please review these Terms and Conditions carefully.

Account Minimums and Activity Requirements

There is no minimum initial account balance required to open a brokerage account with us. However, if you either fail to fund your account or do not return account opening documents as required, your account will be closed.

Brokerage Fees and Our Compensation:

It is important to consider that while a brokerage relationship can be a cost-effective way of investing your assets, it is not for everyone given the fees and costs involved.

Transaction-Based Fees

You will pay transaction-based fees for trades you decide to enter into, such as buying and selling stocks, bonds, Exchange Traded Products (ETPs), mutual funds and other investment purchases and sale. These transaction-based fees are generally referred to as a “commission,” “mark up,” “sales load,” or a “sales charge.” Transaction-based fees are based on a host of factors, including, but not limited to:

- Underlying product selection
- Your brokerage service model and account type
- Size of your transaction and/or overall value of your account
- Frequency of your trade activity
- Available discounts and/or fee waivers

Account and Service Fees

You will pay fees for various operational services provided to you through your brokerage account. These fees are set at least annually and communicated to you through information included in your account statement and other notifications. These fees do not apply to all account types and may be waived under certain conditions.

You should understand that based on the brokerage service model you choose, the same or similar products, accounts and services may vary in the fees and costs charged to you. For more information concerning our administrative and service fees, visit us at [AET Investment Services Fee Schedule](#).

How We Are Compensated

We receive direct and indirect compensation in connection with your accounts. Direct compensation is taken directly from the affected account. Indirect compensation is compensation paid in ways other than directly from the account and may impact the value of the associated investments in your account. The sections below describe the compensation that we receive in connection with various investments that may be available to you. In many cases, the descriptions that follow refer to a prospectus or offering documents.

- Equities, Rights & Warrants, Units
- Fixed Income
- Mutual Funds (refer to the fund prospectus or offering document for details)
 - Annual 12b-1 shareholder service fees, also known as trails, are paid to us by the fund out of the fund assets according to the distribution and servicing arrangement to cover distribution expenses and sometimes shareholder service expenses that we may provide on the fund's behalf. These fees range from 0.00% to 1.00%.
 - Front-end sales charge fees or Contingent deferred sales charges (CDSC)
- Revenue Sharing: FDIC-Insured Sweep Program/Bank Deposit Sweep. Our clearing firm, Apex offers bank deposit sweep products. Under the arrangement, Apex sweeps idle cash into an FDIC insured interest-bearing fund. The revenue that Apex derives from these products is shared, in part, with AET IS.

If, based on AET IS's recommendation or customer direction, a retail customer invests in a Private Fund, the retail customer will purchase the interests of the Private Fund, and those interests will generally be held in an account at AET. The retail customer will be subject to the fees and expenses of the Private Fund, which are disclosed in the applicable Private Fund's offering memorandum or private placement memorandum (the "Private Fund Offering Documents"), which will be provided to the customer prior to the customer's subscription to any Private Fund. As disclosed in the applicable Private Fund Offering Documents, AET IS customers will be subject to placement and engagement fees as stated in the offering documents and AET account fees disclosed in the AET Fee Schedule. If you would like a copy of the Offering Document for any Private Fund we offer, please contact your registered representative.

Conflicts of interest:

Conflicts of interest exist when we provide brokerage services to you. A conflict of interest is a situation in which we engage in a transaction or activity where our interest is materially adverse to your interest. The mere presence of a conflict of interest does not imply that harm to your interests will occur, but it is important that we acknowledge the presence of conflicts. Moreover, our regulatory obligations require that we establish, maintain, and enforce written policies and procedures reasonably designed to address conflicts of interest associated with our recommendations to you.

Our conflicts of interest are typically the result of compensation structures and other financial arrangements between us, our registered representatives, our clients, our affiliates and third parties. We offer a broad range of investment services and products, and we receive various forms of compensation from our clients, non-affiliated product providers, and other third parties as described above. Securities rules allow for us, our registered representatives, to earn compensation when we provide brokerage services to you. However, the compensation that we and our registered representatives receive from you varies based upon the product or service you purchase, which creates a financial incentive to recommend investment products and services that generate greater compensation to us.

We are committed to taking appropriate steps to identify, mitigate and avoid conflicts of interest to ensure we act in your best interest when providing brokerage recommendations to you. Below you will find additional information related to our conflicts of interest.

This information is not intended to be an all-inclusive list of our conflicts but generally describes those conflicts that are material to your brokerage relationship. In addition to this disclosure, conflicts of interest are disclosed to you in

your account agreement(s) and disclosure documents, our product guides and other information we make available to you.

General Basis for Recommendations

AET IS seeks to help retail customers achieve their unique investment objectives and to deliver custom solutions. AET IS and AET IS registered representatives take the time to understand each retail customer's "Investment Profile" (e.g., as applicable, the retail customer's age, other investments, financial situation and needs, tax status, short- and long-term investment objectives, investment experience, investment time horizon, liquidity needs, risk tolerance, estate planning needs, generational giving and philanthropic desires, and any other information the retail customer discloses to AET IS or AET IS registered representatives) in connection with each recommendation. Underscoring that there is no "one-size-fits-all" approach, AET IS and AET IS registered representatives work with each retail customer to recommend investments and, where applicable, asset allocations that align with the needs and financial goals of the retail customer.

Material Risks Associated with Brokerage Recommendations

While AET IS will take reasonable care in developing and making recommendations with respect to each retail customer, investments in securities and other financial instruments involve risk, and retail customers can lose some or all of their money. All investments and investment strategies involving securities involve risk of loss, including the potential loss of a retail customer's entire investment, which the retail customer should be prepared to bear. There is no guarantee that any retail customer will meet the customer's investment goals, or that AET IS's recommended investments will perform as anticipated.

The investment performance and the success of any particular investment or investment strategy can never be predicted or guaranteed, and the value of a customer's investments will fluctuate due to market conditions and other factors. Investments are subject to various market, liquidity, currency, economic, political and other risks. **Past performance of any security or investment strategy is not indicative of future performance.**

Retail customers should consult the offering documents for any security that AET IS recommends that is a Private Fund, for a discussion of risks associated with the particular fund. If you would like a copy of any Offering Documents or Private Fund Offering Documents prior to purchasing shares or interests in a Private Fund, please contact your AET IS registered representative by calling (702) 534-4585.

In addition to the investment-specific risks associated with investments and investment strategies involving securities, there are other potential risks associated with any relationship with financial intermediaries, such as AET IS. For example, as the use of technology increases, AET IS may be more susceptible to operational or information security-related risks. A breach in cybersecurity refers to both intentional and unintentional events that may cause AET IS to lose proprietary information or operational capacity or suffer data corruption. Cybersecurity breaches of AET IS or third-party service providers or issuers in which customers and clients invest may also subject AET IS to many of the same risks associated with direct cybersecurity breaches. Cybersecurity breaches can cause disruptions and affect business operations, potentially resulting in financial losses, impediments to trading, the inability to transact business, destruction to equipment and systems, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement or other compensation costs or additional compliance costs.

Standard of Conduct under Regulation Best Interest

Reg BI requires that AET IS and AET IS registered representatives act in the best interest of the retail customer at the time a recommendation of a security or an investment strategy involving a security is made, without placing the financial or other interest of AET IS or the AET IS registered representative ahead of the interest of the retail customer.

The requirement under Reg BI that AET IS and AET IS registered representatives act in the best interest of the retail customer is limited to recommendations of a security or investment strategy involving securities by AET IS and AET IS registered representatives.

Material Facts Regarding Conflicts of Interest

Reg BI defines a conflict of interest associated with a recommendation as "an interest that might incline a broker, dealer, or a natural person who is an associated person of a broker or dealer — consciously or unconsciously — to make a recommendation that is not disinterested."

When AET IS provides you with a recommendation regarding securities or investment strategies involving securities, AET IS registered representative must act in your best interest at the time the recommendation is made without putting their interest ahead of yours. At the same time, the way AET IS registered representatives make money and otherwise conduct business creates conflicts with your interests. Where possible, AET IS has taken steps to mitigate or eliminate

material conflicts of interest associated with recommendations regarding securities and investment strategies involving securities.