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Stephens Inc.

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Stephens Small-Mid Cap Core Growth Program

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Uniform Application for Investment Adviser Registration

This wrap fee program brochure provides information about the qualifications and business practices of Stephens Inc. If you have any questions about the contents of this brochure, please contact us at **877-891-0095 or www.stephens.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 Stephens Inc. also is available on the SEC's website at **www.adviserinfo.sec.gov.**

Stephens Inc. is a registered investment adviser with the United States Securities and Exchange Commission. Registration does not imply a certain level of skill or training.

Item 2 Material Changes

This is an annual update to the Stephens Small-Mid Cap Core Growth Program wrap fee program brochure. This section identifies and discusses material changes since the last annual update dated March 31, 2026. For more details, please see the item in this brochure referred to in the summary below.

No material changes have been made to this brochure since the last annual update referenced above.

Item 3 Table of Contents

Stephens Small-Mid Cap Core Growth Program **1**
Item 2 Material Changes **2**
Item 3 Table of Contents **3**
Item 4 Services, Fees and Compensation **4**
Stephens Small/Mid Cap Core Growth Program 4
Investment Management Agreement 5
Management Fee Schedule For Stephens Small-Mid Cap Growth Accounts 5
SMID Core Strategy Offered Through Stephens' MAP 6
Collection of Fees 6
Is a Wrap Fee Arrangement for you? 6
Confirmations, Account Statements and Performance Reviews 6
Comparing Costs 7
Additional Fees 7
Item 5 Account Requirements and Types of Clients **11**
Conditions for Management 11
Types of Clients 11
Item 6 Portfolio Manager Selection and Evaluation **12**
Affiliated Adviser 12
Performance Calculations 12
Conflicts of Interest 12
Other Potential Conflicts of Interest 14
Advisory Services 17
Restrictions 18
Wrap Fee Programs 18
Performance-Based Fees and Side-By-Side Management 19
Methods of Analysis, Investment Strategies and Risk of Loss 19
Policies and Procedures for Proxy Voting 21
Corporate Actions and Other Matters 22
Item 7 Client Information Provided to Portfolio Managers **22**
Item 8 Client Contact with Portfolio Managers **22**
Item 9 Additional Information **23**
Disciplinary Information 23
Affiliations 23
Code of Ethics 23
Supervision and Review of Accounts 24
Client Referrals and Other Compensation 25
Financial Information 25
Who to Contact 26

Item 4 Services, Fees and Compensation

Stephens Inc. ("Stephens") is an Arkansas corporation which registered with the Securities and Exchange Commission ("SEC") as a broker-dealer in September 1946. Stephens registered as an investment adviser with the SEC on September 19, 1980, and began providing investment advisory services at that time.

Stephens is a full service broker-dealer and investment bank. In addition to being registered with the SEC, Stephens is a member of the Financial Industry Regulatory Authority ("FINRA"), the New York Stock Exchange, Inc. ("NYSE"), the NYSE American LLC ("NYSE-AMEX"), the Municipal Securities Rulemaking Board ("MSRB"), the Investors' Exchange LLC ("IEX") and the Securities Investor Protection Corporation ("SIPC"). Stephens derives greater revenues from its broker-dealer and investment banking activities than it derives from its investment adviser activities. Affiliates of Stephens are also separately engaged in financial services businesses, including merchant banking, insurance and investment advisory businesses.

Stephens Small/Mid Cap Core Growth Program

Stephens Small-Mid Cap Core Growth Program ("SMID Core") is an investment advisory wrap program of Stephens. The investment portfolio of SMID Core accounts is managed by Stephens Investment Management Group, LLC ("SIMG"), an affiliate of Stephens. SIMG was organized in July 2005 and is registered with the SEC as an investment adviser. SIMG manages and directs the investment of the assets in each SMID Core program client's account on a discretionary basis in accordance with its small and mid-cap core growth equity investment style and on the basis of the individual objectives and needs of the client within the criteria established by the SMID Core program. SIMG personnel may also provide services to other clients and to other products or programs.

In the SMID Core program, SIMG establishes the investment policy and strategy for the portfolio, selects the securities to be included in the portfolio and makes the day-to-day investment decisions. The goal of SIMG is to seek growth of the equity value of a portfolio of small and mid-cap equity investments for clients, consistent with clients' investment objectives.

SIMG attempts to identify core growth stocks among stocks of companies that have a market capitalization at the time of purchase no larger than the market capitalization of the largest company then included in the Russell 2500™ Growth Index, using a disciplined bottom-up approach, employing financial screening techniques, fundamental research and the portfolio managers' judgment, with a focus on identifying small-cap companies and mid-cap companies believed to have above-average potential for equity growth.

The portfolio benchmark is the Russell 2500™ Growth Index. The Russell 2500™ Growth Index measures the performance of those Russell 2500™ companies with higher price-to-book ratios and higher forecasted growth values. The Russell 2500™ Index is a trademark/service mark of the Frank Russell Company. Russell® is a trademark of the Frank Russell Company.

SIMG invests SMID Core assets primarily in long positions in equity securities. However, from time to time SIMG may invest SMID Core assets in other types of securities, including without limitation, short term fixed income securities, exchange-traded funds and other investment company securities, and stock index futures. SIMG generally seeks to fully invest cash balances.

Investments made through the SMID Core program are concentrated in investments in equities of small- and mid-cap growth companies and are not diversified across other asset classes. Small- and mid-cap growth strategies may be more volatile and less liquid than other investment strategies. Investing in small-cap and mid-cap issuers involves greater risk than investing in more established companies and investors should only invest a portion of their total portfolio in these securities.

Typically, individual investors are advised not to allocate more than ten to fifteen percent of their overall investment portfolio to a small and mid-cap growth strategy. The SMID Core program portfolio is not managed for tax efficiency.

The investment strategy used by SIMG in the SMID Core program is also available to appropriate Stephens clients in the Stephens Managed Assets Program ("MAP").

Investment Management Agreement

Entering into an advisory relationship with Stephens for the SMID Core program, involves the execution by client of an Investment Management Agreement ("Advisory Agreement" or "Agreement") and a general account agreement. The term of the Advisory Agreement is generally for a period of one year beginning on the effective date of the agreement and is automatically renewed for successive additional one-year terms without further action. At the time of entering into the Advisory Agreement, the client will be afforded a right to terminate the Agreement within five (5) business days after entering into the Agreement and receive a full refund of any investment advisory fees paid to Stephens. At any time, either the client or Stephens may terminate the Agreement without penalty, upon fifteen (15) days' notice given in writing to the other party hereto. If the account is to be liquidated as the result of a termination notice, it is understood that Stephens may take up to five (5) trading days to effect such liquidation following the date the liquidation request was received by Stephens. Proceeds will be payable to client within ten (10) business days of termination. Upon termination of the account and payment of all sums, which may be owed to Stephens in connection with the account, Stephens shall make such disposition of the managed securities or other property of the client held by it as may be directed by the client. The client agrees to pay Stephens' reasonable fees, costs and expenses incurred for such disposition and for collection, including attorney fees, of any unpaid balances under the Agreement.

On June 5, 2019, the SEC issued its interpretation of the Standard of Conduct for Investment Advisers and rescinded certain previously issued no action letters. As a result of these changes, Stephens will not seek to enforce any provision of an investment advisory agreement with a retail investor which discharges Stephens or its agents from liability to the retail investor client.

Management Fee Schedule For Stephens Small-Mid Cap Growth Accounts

Stephens' fee for a SMID Core account is based on a percentage of assets under management. The annual fee is one- and one-half percent (1.5%) of assets under management. Fees are negotiable based on a number of factors including the type and size of the account. A portion of the SMID Core account fees, generally representing twenty to fifty percent (20%-50%) of SMID Core fees, will be paid to SIMG for its portfolio management services, pursuant to a sub-advisory agreement between Stephens and SIMG.

Stephens' SMID Core fees apply to standard accounts and include management, trade execution services, associated accounting reports and investment management reports, all provided by Stephens. This is known as a wrap fee. The wrap fee also encompasses commissions on securities transactions executed for SMID Core accounts through Stephens. The SMID Core wrap fee does not include commissions or fees for securities brokerage or execution services provided by other brokerage firms, all of the costs of which (if any) will be borne by the client and charged to the client's account.

The fee, from the opening of the account ("effective date") to the end of the then-current calendar quarter, will be obtained by computing the adjusted market value of cash and securities in the portfolio as of the close of business on the last day (subsequent to the effective date) of the current calendar quarter and multiplying the resultant market value by one-fourth of the applicable annual fee rate(s), prorated for the percentage of the current calendar quarter during which the portfolio is under management.

The fee for any subsequent three-month period will be the amount obtained by computing the adjusted market value of cash and securities in the portfolio as of the close of business on the last business day of the three-month period and multiplying the resultant market value by one-fourth of the applicable annual fee rate(s). In the event a client's account is closed between quarter-ends, fees will be prorated as of the date of termination. The fee will be deducted from the client's account by Stephens quarterly unless otherwise agreed in writing. Clients will receive a Fee Statement following the deduction of the fee.

Each security in the portfolio is generally valued as of the close of business on a business day at its last trading price in its primary trading market on that day. A security for which trading has been halted or in which trading has not occurred will be valued at its last trading price or at its last reported or last available bid price or at a price that Stephens believes more accurately reflects the market value of such security in light of the circumstances surrounding the trading halt or the absence of trading activity, as well as the performance and prospects of the company's business, to the extent such information is made available to Stephens.

SMID Core Strategy Offered Through Stephens' MAP

The SMID Core strategy is available to clients of the Stephens Private Client Group through Stephens MAP. Please see Stephens' Form ADV Part 2A for more information about the MAP program and its fees.

Collection of Fees

Stephens is authorized to deduct from your account each quarter the amount of the total quarterly wrap fee as described in the Investment Management Agreement, and the other fees, if any, applicable to your account for such calendar quarter. Stephens will issue quarterly reports to you reflecting the transactions in your account and the performance of the investments. Service fees and other transaction changes, if any, will be applied to the account as incurred.

Is a Wrap Fee Arrangement for you?

The SMID Core program is a "wrap fee program" in which the client pays a single fee for investment advisory services and related services, which may include executions, custody and clearing charges.

The SMID Core program may cost the client more or less than purchasing such services separately depending upon such factors as trading activity, account size and investment adviser minimums for non-wrap accounts. We encourage you to carefully consider your options in establishing or maintaining an advisory fee-based account. As a general matter, a fee-based advisory account approach may be considered appropriate for customers who rely on investment advice or investment management services or who engage in moderate to high levels of trading activity. A fee-based approach can be more economical for customers who engage in active trading, since the price per trade is reduced as the number of trades increases under a fee-based approach. However, fee-based advisory account arrangements may not be appropriate for customers who rely primarily on their own independent resources and judgments for making their investment selections and decisions and do not wish to purchase advisory services. Customers who engage in a lower level of trading activity might prefer a traditional brokerage account with a commission payable on each transaction, particularly if the customer typically does not utilize advisory services for trading decisions, as transaction cost savings might be realized in the context of a traditional pay-per-trade commission structure.

Typically, a portion of any revenue that the firm realizes in connection with an advisory account will be included in the calculation of the compensation to be paid by the firm to the Financial Consultant ("FC") or Investment Adviser Representative ("IAR"); and, therefore, the FC or IAR will experience conflicts of interest similar to those experienced by the firm.

Confirmations, Account Statements and Performance Reviews

In most cases, Pershing LLC ("Pershing") is the custodian of your account and provides you with written or electronic confirmation of securities transactions, and account statements at least quarterly. You will also receive a monthly account statement if you have had qualifying activity in your account during the month, which will detail the activity and the positions in your account. If you have not had any qualifying activity during the month and you have positions in your account, you will receive a quarterly account statement, which details the positions in your account. You may waive the receipt of account statements or confirmations after each trade in favor of e-delivery via https://stephensaccess.netxinvestor.com/web/stephens/login. You may also receive mutual fund prospectuses, where appropriate.

We will provide you periodic reviews of your account. These show how the account investments have performed on an absolute basis.

Stephens will periodically review client portfolio holdings to determine whether advisory clients who hold mutual fund positions are invested in appropriate share classes for the mutual fund positions in their accounts.

Comparing Costs

Depending on the level of trading and types of securities purchased or sold in your account, you may be able to obtain transaction execution at a higher or lower cost if purchased separately at Stephens than through this wrap fee program.

Additional Fees

In an advisory program, you will pay Stephens an asset-based wrap fee for investment advisory and other services provided by Stephens or Pershing. These services include custody of securities and trade executions through Pershin on behalf of Stephens. The wrap fee does not cover:

- the costs of investment management fees and other expenses charged by Funds and UITs;
- "mark-ups", "mark-downs", and dealer spreads that Stephens receives when acting as principal in certain transactions where permitted by law;
- brokerage commissions or other charges resulting in transactions not effected through Stephens with Pershing;
- account transfer fees;
- processing fees; or
- certain other costs or changes may be imposed by third parties.

As your introducing broker, Stephens can receive or pay compensation for directing order flow in equity securities. Pershing receives compensation for the direction of order flow in certain equity securities and listed options. The source and nature of the compensation, if any, received in connection with trades will be furnished upon your written request to your FC or IAR.

Stephens Insured Bank Sweep Program

The Stephens Insured Bank Sweep Program ("Bank Sweep Program") is available to Stephens' clients through Pershing, and Pershing has appointed IntraFi Network LLC ("IntraFi") to provide certain services in connection with the Program. In the Bank Sweep Program, each bank participating in the program ("Program Bank") pays a return based on the amount of funds in your Deposit Account at the bank. The interest rate applicable to your Deposit Accounts is determined by the amount of interest participating banks are willing to pay on the aggregate balance of the deposits minus: (i) the fees paid to IntraFi, as administrator, (ii) the fees paid to Pershing for its services, and (iii) the fees paid to Stephens.

Stephens retains and exercises the right to negotiate its own fee and may reduce or increase its fee. Because an increase in fees to Stephens reduces the effective amount of the interest rate that is ultimately paid to customers, Stephens has a conflict of interest with regard to the Bank Sweep Program. Stephens' compensation, exclusive of the fees paid to Pershing and IntraFi for the Bank Sweep Program as applied to all clients will not exceed 6% per annum on the aggregate balances in the Deposit Accounts at the Program Banks. The total amount of the fee Stephens charges affects the amount of interest payable to clients on their Deposit Accounts since the higher Stephens' fee is, the lower the amount of interest that is paid to Stephens' clients.

Stephens charges investment advisory fees as a percentage of client assets under management which includes cash assets in the Bank Sweep Program. This means that clients will pay Stephens' investment advisory fee in addition to the fees charged in the Bank Sweep Program which are described above. More information on the current rates of return and fees is available at www.stephens.com/investment-disclosures/ which is incorporated herein.

The interest rates on the Deposit Accounts will vary based upon the aggregate balance of all your "linked" Stephens accounts registered with the same tax ID number. This is referred to as your "Household Balance" and is described in more detail at www.stephens.com/investment-disclosures/. The rates and the interest rate tiers may change from time to time. Further information on the Bank Sweep Program is available at https://www.stephens.com/investment-disclosures/stephens-insured-bank-sweep-program-rates/. These disclosures are incorporated herein.

The interest rates paid on the Deposit Accounts at a Program Bank will usually be lower than prevailing market interest rates and returns on other investment alternatives. You should compare the terms, interest rates, required minimum amounts, and other features of the Bank Sweep Program with other accounts and investment alternatives.

In deciding whether to participate in the Bank Sweep Program, clients should consider the return they are expected to receive versus the safety of the program. Program Banks participating in the Bank Sweep Program are not selected by Stephens, and each bank participating in the Bank Sweep Program is covered by FDIC deposit insurance up to the applicable FDIC limit. Program Banks in the program are expected to have acceptable credit but may not have "top tier" credit, and clients should evaluate credit quality and FDIC insurance coverage together with the return they are expected to receive.

Custodial Services

Stephens entered into a fully disclosed clearing arrangement with Pershing effective November 15, 2019, wherein Pershing provides certain recordkeeping and operational services to Stephens and to Stephens' clients. The services provided by Pershing include execution and settlement of securities transactions, custody of Stephens' client accounts and extensions of credit for any margin transactions.

Pershing normally provides custodial account services to Stephens' clients. Custodial services provided by Pershing include custody of securities in your account, periodic statements, certain tax reporting and other similar services. Pershing is a subsidiary of the Bank of New York Mellon Corporation and is located at One Pershing Plaza, 4th Floor – Jersey City, NJ 07399. Pershing will send your account statements, which you should carefully review. In addition to the account statements Pershing sends you, we may send you a quarterly performance report which among other things lists your account holdings and performance. You should compare our report to the account statements you receive from Pershing. In the event of any discrepancy between our report and any statement you receive from Pershing regarding the same investment, you should rely on the statement from Pershing.

Your account will be subject to the terms and conditions described in the Advisory Agreement and any separate agreement or agreements executed in connection with the account.

Stephens includes custodial fees for custody services and securities services provided by Pershing within the wrap fee charge. If a client's account is under a wrap fee program, commission charges are included as part of the Stephens advisory fee unless the client has selected a third party adviser who "trades away" from Pershing. Clients may engage an independent custodian. The fees of any custodian other than Pershing are not covered by the wrap fee and are the separate responsibility of the client. Clients may direct trading through another broker or other execution venue, and, in such a situation, the client will be responsible for all costs and commissions incurred in connection with such trading.

Pershing Relationship
Pershing is the clearing firm for our securities business. Due to this business relationship, Pershing shares with us a portion of the transaction costs and fees you pay to Pershing for certain transactions and services. This compensation we receive is an additional source of revenue to Stephens, and it defrays our costs associated with maintaining and servicing client accounts.

Your advisory fee is not reduced or offset as a result of any revenue that Pershing shares with Stephens. The following is a brief description of some of revenue and other items.

- Pershing pays us on a quarterly basis an Active Account Credit in support of our ongoing investment in various businesses, marketing and technology initiatives relating to the services we offer. This Active Account Credit is based on the total number of Stephens client accounts held on the Pershing platform.
- Pershing also pays us a Basis Point Credit each quarter which is computed based on the total value of Stephens client accounts held on the Pershing platform.
- Pershing also provides consulting and other assistance to us from time to time.
- Stephens receives revenues from Pershing on any investor free credit balances. These revenues are not received by Stephens for free credit balances in Employee Retirement Income Security Act ("ERISA") and Individual Retirement Account ("IRA") accounts.
- Stephens determines the margin debit interest rate and receives any amounts paid by customers in excess of the Fed Funds Target Rate plus 85 basis points.
- Stephens determines the interest rate charged to clients who obtain non purpose loans within parameters set by Pershing. Stephens receives 100 bps of the interest paid on the loan from Pershing except in situations where Stephens has agreed to receive a lesser amount.
- Pershing pays us a placement fee for each CD purchased through Pershing by a Stephens' client.
- Pershing pays us a portion of the revenues it receives for banking services provided to clients.

For the period January 1, 2025, through December 31, 2025, Pershing paid Stephens the following revenues:

- A short interest rebate of $1,771,340
- Interest based on investor free credit balances of $1,553,629
- Margin interest credit of $993,200
- Active account and basis point credits of $2,022,170
- Non Purpose Loan interest of $685,784
- Silver Account (i.e. checking account) fee of $24,000
- Fee Income-Pershing-Legal/Transfer $1,200
- Pershing-Money Market Invesco ATRR $266,497

Where Stephens receives compensation from Pershing, this presents a conflict of interest because Stephens and your FC or IAR have a greater incentive to make available, recommend, or make investment decisions regarding investments and services that provide additional compensation over those investments and services that do not.

The agreement between Stephens and Pershing ("Clearing Agreement") is for an initial term of 10 years effective November 15, 2019, and it provides for a substantial termination penalty in the event Stephens terminates the Clearing Agreement prior to the end of the initial term. At the outset of the Clearing Agreement, the termination penalty was $15 million, and it declines $2 million each year to $5 million in years 6 through the end of the Clearing Agreement. The termination penalty serves as a disincentive for Stephens to terminate the Clearing Agreement in the event Stephens or its clients have a negative experience with Pershing or if Stephens believes another firm offers superior service. This creates a conflict of interest in that it could influence Stephens' decision to remain with Pershing even though it may be in the best interest of Stephens or its clients to terminate the Clearing Agreement.

You should only use the cost basis information provided on your custodial account statements for tax reporting purposes.

Pershing's mailing address is Pershing LLC; One Pershing Plaza; Jersey City, New Jersey 07399.

For IRA and other retirement accounts, Pershing may charge termination fees pursuant to an adoption agreement you enter into with Pershing, which authorizes Pershing to act as the IRA custodian for Internal Revenue Service purposes. Pershing may resign at any time as the IRA custodian and then you have the right to appoint a successor IRA custodian (Successor).

If an unaffiliated third party acts as custodian of account assets, the custodian and the client, and not Stephens, would determine where cash reserves will be held.

ERISA and IRA Fees

Fees charged by Stephens to accounts of ERISA or Internal Revenue Code ("the Code") covered plans will comply with the limitations made applicable under ERISA or the Code. Where Stephens or an IAR provides non-discretionary investment advice such as recommending the rollover of a 401k to an IRA account at Stephens, recommending opening an IRA account with Stephens, or recommending the transfer of an IRA from another firm to Stephens, this presents a conflict of interest since compensation will be paid to Stephens and the IAR in connection with these services.

In addition, Stephens charges different levels of fees on different investment services. Stephens has adopted policies and procedures to mitigate these conflicts, and to address provisions of and prohibitions under ERISA and the Code with respect to potential conflicts of interest and self-dealing.

ERISA Section 408(b)(2) Disclosures

You may be, or may be acting on behalf of, a pension plan governed by the Employee Retirement Income Security Act of 1974, as amended (ERISA). ERISA section 408(b)(2) requires most parties that provide services to employee benefit plans to disclose certain information to a responsible plan fiduciary. Generally, the service provider must disclose the services that it provides to the plan and the compensation that it expects to receive in connection with the services.

Stephens' disclosures are available at the following web address: www.stephens.com/ERISA408b2

If you are the responsible plan fiduciary, please view the disclosures on this website. If you are not the responsible fiduciary, please forward this information to the responsible fiduciary of the plan.

Please review this website periodically for any required updates.

Principal Transactions
Pursuant to Section 206(3) of the Investment Advisers Act, Stephens, acting as a principal for its own account, will not knowingly sell any security to or purchase any security from an advisory client, without obtaining the client's prior consent to each such transaction and disclosing: 1) the capacity in which it is acting; and 2) the quantity and dollar amount of the securities being purchased or sold.

As a practical matter, the above requirements impose delays on the time at which principal transactions can be effected for advisory accounts and thereby can impair the execution quality of such transactions for advisory clients. Accordingly, transactions are generally executed on an agency basis.

Investment advisory clients are advised that they have the option to seek execution of transactions recommended by the FC or IAR through broker/dealers other than Stephens. However, on transactions executed through Stephens with Pershing, Stephens or Pershing will not charge a commission to the client, except when an underwriting issue in which Stephens participates is purchased for an account; in this case, the sales concession and underwriting fees are built into the offering price.

Stephens will strive to obtain "best execution" of transactions for clients in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances.

Transactions in securities in which Stephens acts as a market-maker, or otherwise as a principal will only be affected for clients subject to the client's written consent to such transaction indicating the quantity and dollar amount of the securities being purchased or sold. If Stephens is acting as a market-maker or otherwise as a principal, Stephens has the potential for profit or loss on securities it sells to or buys from a customer.

Item 5 Account Requirements and Types of Clients

Conditions for Management
Generally, a minimum of $250,000 in assets is required for the establishment of investment advisory accounts under the SMID Core program. However, exceptions may be made to this policy. Stephens or the client can terminate SMID Core agreements at any time following advance written notice. Only those clients whom we, in our discretion, deem suitable will be accepted into this program.

Types of Clients
Stephens' advisory programs are available to individuals, banks, foundations, pension and profit sharing plans, trusts, IRAs, endowments, corporations, partnerships and other entities requiring investment advisory services.

Many of Stephens' clients are high net worth individuals. We provide investment advice to individuals, trusts, to boards and retirement systems for various governmental pension and retirement plans, to corporate pension and retirement plans, to various foundations and private entities.

Additionally, Stephens advises wrap fee accounts in various programs sponsored by affiliated and unaffiliated investment advisers. The sponsor establishes a minimum account size for each program, and you should refer to the sponsor's wrap fee brochure for a discussion of minimum account sizes and whether the minimum account size can be waived.

Item 6 Portfolio Manager Selection and Evaluation

Affiliated Adviser

The SMID Core program engages SIMG to act as a Sub-Advisor and Portfolio Manager for the client's account. SIMG is an investment adviser registered with the SEC in which affiliates of Stephens hold the entire ownership of voting securities. SIMG provides investment advisory services for separate account clients and for mutual funds known as the American Beacon Stephens Funds® or other funds which may be added from time to time. SIMG also serves as adviser to two collective investment trusts ("CITs") using its Small Cap Growth and Mid Cap Growth strategies, respectively. Additionally, SIMG serves as an investment adviser to the First Trust Multi-Manager Small Cap Opportunities ETF (MMSC) using its Small Cap Growth Strategy, and as an investment adviser to the following multi-manager mutual funds under our SMID Select Growth Strategy:

- Vanguard Explorer™ Fund; and
- Bridge Builder Small/Mid Cap Growth Fund.

The replacement of SIMG as Sub-Advisor in the SMID Core program may be recommended under the following circumstances:

- Change of client's investment situation or goals;
- Sub-Advisor philosophy changes;
- Sub-Advisor exposes client's account to investment style change;
- Sub-Advisor firm undergoes ownership change or major personnel change;
- Sub-Advisor performance lags peer group benchmarks;
- Stephens, in consultation with client, determines to effect a change; or
- Sub-Advisor holds an unnecessarily large cash position.

In appropriate situations where the client's investment situation or goals change, Stephens will recommend clients not continue their participation in the SMID Core program.

Performance Calculations

Stephens relies upon performance information provided by SIMG and third party providers, to determine if SIMG and the SMID Core program are appropriate for the client's account. Stephens does not regularly audit the calculation of this performance information to ensure that it is calculated on a consistent basis.

The performance review includes a comparison of the performance of Sub-Advisors with the performance of selected market indices and peer group averages to evaluate the performance of SIMG over time.

Stephens utilizes a portfolio system licensed from a third party to calculate the performance of client accounts and to prepare portfolio performance reports for clients.

To determine the value of securities in your account, Stephens generally relies on third party quotation services. If a price is unavailable or believed to be unreliable, we may determine the price in good faith and may use other sources such as the last recorded transaction.

Conflicts of Interest

Conflicts of Interest Ownership

Pursuant to Section 206(3) of the Investment Advisers Act, Stephens, acting as a principal for its own account, will not knowingly sell any security to or purchase any security from an advisory client, without obtaining the client's prior consent to each such transaction and disclosing: 1) the capacity in which it is acting; and 2) the quantity and dollar amount of the securities being purchased or sold.

As a practical matter, the above requirements may impose delays on the time at which principal transactions may be effected for advisory accounts, and thereby may impair the execution quality of such transactions for advisory clients. Accordingly, transactions are generally executed on an agency basis.

Transactions in which Stephens acts as a principal will only be effected for clients subject to the client's written consent to such transaction indicating the quantity and price of the securities being purchased or sold. If Stephens is acting as a market-maker or otherwise as a principal, Stephens has the potential for profit or loss on securities it sells to or buys from a client.

American Beacon Stephens Funds® and Hotchkis & Wiley Funds ("Affiliated Funds") are funds managed by affiliates of Stephens and/or advisers in which affiliates of Stephens have a substantial ownership interest. ERISA accounts and IRA accounts are generally prohibited from investing in these Funds. Other advisory accounts may invest in the Affiliated Funds in an appropriate amount if: (1) the manager and the client determine that the investment is suitable for the account, and (2) the client signs an Affiliate Funds Consent Letter ("Consent Letter") prior to directing the purchase of the affiliated fund shares.

Hotchkis and Wiley Limited ("HW-UK"), a wholly-owned subsidiary of H&W, is a private limited company incorporated in England and Wales. HW-UK is an appointed representative and tied agent of Arlington Group Asset Management Limited (AGAM) since March 1, 2016. AGAM is authorized by the Financial Conduct Authority to carry out regulated activities. The Chief Executive of HW-UK is also an appointed representative of AGAM and may carry on certain regulated activities in Europe.

Portfolio Management by Advisers Owned or Partially Owned by Stephens

Affiliated Mutual Funds and ETFs

Stephens may from time to time engage in transactions on behalf of clients with Hotchkis & Wiley Capital Management LLC ("H&W") or with mutual funds and ETFs advised by H&W. H&W is an investment adviser registered with the SEC in which entities under common control with Stephens hold an ownership interest. H&W provides investment advisory services to corporate, pension, public, endowment, foundation, mutual fund and other clients, and H&W also advises its own family of mutual funds and ETFs.

Stephens may also from time to time engage in transactions on behalf of clients with Stephens Investment Management Group LLC ("SIMG") or with mutual funds advised by SIMG. SIMG is an investment adviser registered with the SEC in which members of the Stephens family are beneficial owners of 100 percent of the voting interests. SIMG provides investment advisory services for separate account clients and for mutual funds known as the American Beacon Stephens Funds® or other funds which may be added from time to time.

Additionally, SIMG serves as one of the investment advisers to the following multi-manager mutual funds using its SMID Select Growth Strategy or Small Cap Growth Strategy:

- Vanguard Explorer™ Fund; and
- Bridge Builder Small/Mid Cap Growth Fund; and
- First Trust Multi-Manager Small Cap Opportunities ETF (MMSC)

H&W advised mutual funds and SIMG advised mutual funds are offered through Stephens' broker dealer services and/or investment advisory services as part of an investment program. Clients that invest in H&W advised mutual funds or ETFs or in SIMG advised mutual funds would bear a proportionate share of the fees and expenses of those funds including the management fees or other fees paid to H&W or SIMG. These fees and expenses include commissions or fees, if any, paid to Stephens in connection with portfolio transactions. Please refer to each mutual fund or ETF's prospectus for a full discussion of the fees and expenses of each mutual fund or ETF.

Stephens Sponsored Wrap Fee Program

Stephens sponsors the Stephens Small-Mid Cap Core ("SMID Core") Growth Program which is a wrap fee program sub-advised by SIMG that follows its SMID Core Growth Model. FCs and IARs are not financially incentivized to place clients in the SMID Core Growth Program versus any other wrap program or platform available at Stephens. However, a portion of the SMID Core account fees, generally representing twenty to fifty percent (20%-50%) of SMID Core fees, will be paid to SIMG for its portfolio management services, pursuant to a sub-advisory agreement between Stephens and SIMG. SIMG and Stephens share common ownership, which benefits from the compensation generated to SIMG as the result of a client investing in the SMID Core Growth Program. Depending on the level of trading, the value of the account, and types of securities purchased or sold, clients may be able to obtain transaction execution at a higher or lower cost if purchased separately at Stephens or SIMG than through this wrap fee program.

Affiliated Investment Management Activities

Certain investment strategies offered by SIMG have been selected for inclusion in PCG's MAP. Sub-Advisors and strategies may only participate in MAP if they have been approved by the MAP Investment Committee. The MAP Investment Committee employs a process for evaluating investment managers that includes both qualitative and quantitative factors. SIMG strategies participating in MAP are subject to the same due diligence and evaluation processes as sub-advisors or strategies that have no affiliation with Stephens. FCs and IARs are not financially incentivized to favor selecting SIMG strategies over non-affiliated sub-advisors or strategies. However, selection of an SIMG strategy in MAP generates compensation to SIMG, which shares common ownership with Stephens.

Other Affiliations

Certain entities affiliated with Stephens or under common control with Stephens hold an ownership interest in ABR Capital Partners (formerly known as Alex Brown Realty, LLC), a registered investment adviser. From time to time, Stephens offers to its clients securities sponsored by ABR Capital Partners, LLC.

Stephens sometimes refers clients to Stephens Insurance, LLC, an affiliated insurance agency under common control with Stephens, for advice pertaining to products that are provided through Stephens Insurance, LLC, and IARs and FCs may be eligible, subject to regulatory and legal requirements, to receive referral fees for insurance business referred.

For further information that pertains to related persons of Stephens, please refer to "Other Potential Conflicts of Interest".

Other Potential Conflicts of Interest

Stephens is a diversified financial services company that directly or through affiliates provides a wide variety of investment banking, securities, insurance and other investment-related services to a broad array of customers. These relationships could give rise to potential conflicts of interest. Any of the following types of transactions could present a potential for a conflict of interest.

a) Client account assets can be invested in interests of money market funds, mutual funds, other investment companies, privately offered investment funds and other collective vehicles (collectively, "Funds") for which Stephens or its affiliates acts as investment adviser, sponsor, administrator, distributor, selling agent, or in other capacities ("Affiliated Funds"). In addition, Client account assets can be invested in interests of Funds for which Stephens or its affiliates do not act as investment adviser, sponsor, administrator or in other capacities. Stephens or its affiliates receive fees for services provided to such Funds, which often include (but are not limited to) fees payable under a plan adopted pursuant to Rule 12b-1 under the Investment Company Act of 1940, as amended ("12b-1 fees") and fees paid to compensate Stephens for providing administrative services, distribution services, shareholder services, investment advisory services or other services to or for the benefit of such Funds. Stephens, as a dually-registered broker-dealer, is paid the retail 12b-1 fees for brokerage mutual fund investments. Where 12b-1 fees are received in advisory accounts, these fees are rebated to the client account.

b) From time to time, Client account assets are often invested in transactions that involve or constitute a purchase, sale or other dealings with securities or other instruments for which (i) Stephens, (ii) an affiliate or employee of Stephens, (iii) an entity in which Stephens or an affiliate has a direct or indirect interest, or (iv) another member of a syndicate or other intermediary (where an entity referred to in (i), (ii), or (iii), above is or was a member of the syndicate), has acted, now acts, or in the future may act as an underwriter, syndicate member, market maker, dealer, broker, principal, agent, research analyst or in any other similar capacity, whether the purchase, sale or dealing occurs during the life of the syndicate or after the close of the syndicate.

c) Stephens or any other broker-dealer that is or may become affiliated with Stephens (the "affiliated brokers") is expected to act as broker or dealer to execute transactions on behalf of the client's account. The client will not be charged a separate fee for brokerage services provided to the account by affiliated brokers.

d) Stephens or its affiliates sometimes effect transactions for the client's account with other accounts for which Stephens or an affiliate provides investment advisory services ("Cross Trades"). Such Cross Trades are intended to enable Stephens to purchase or sell a block of securities at a set price and possibly avoid an unfavorable price movement that may be created through entrance into the market with such purchase or sell order. Stephens typically receives compensation from other accounts involved in a Cross Trade.

e) Subject to applicable regulations, Stephens or its affiliates sometimes execute "Agency Cross Transactions" for the client's account. Agency Cross Transactions are transactions where Stephens, or any affiliate of Stephens, acts as broker for both the client's account and the other party to the transaction. In such transactions, Stephens, or any of Stephens' affiliates acting as broker, receives commissions from the other party to such transaction, to the extent permitted by law, in addition to its customary investment management or advisory fee for the client's account.

f) Clients of other divisions of Stephens or clients of other advisory representatives of Stephens or Stephens, its principals, employees, affiliates and their family members, sometimes hold, and sometimes engage in transactions in, securities purchased or sold for the client or about which Stephens gives or has given the client advice. The client's account may purchase as investments securities of companies with which Stephens or its affiliates maintain investment banking relationships or other relationships or securities of companies in which Stephens or its affiliates have an ownership or other investment interest.

g) Subject to applicable law, Stephens sometimes pays fees to, and/or shares revenues with, affiliates or non-affiliates in connection with referrals for investment advisory accounts. For additional information regarding referrals, please see Item 9.

h) Stephens, or its affiliates, may provide more than one type of service to the client (or a related organization), including (but not limited to), investment management services, investment advisory services, financial advisory services, underwriting services, placement agency services, investment banking services, securities brokerage services, securities custodial services, insurance agency services, insurance brokerage services, administrative services or other services, or any combination of services, all on such terms as may be agreed between Stephens (or its affiliate) and client (or its related organization).

i) Other divisions and other advisory representatives of Stephens perform investment advisory services for clients other than the client and such other divisions or other advisory representatives of Stephens give advice or take action with respect to other clients that is similar to or different from the advice given or action taken for the client's account, in terms of securities, timing, nature of transactions and other factors. Stephens will, to the extent practicable, attempt in good faith to allocate investment opportunities among its clients, including the client, on a fair and equitable basis. However, other divisions and other advisory representatives of Stephens will not undertake to make any recommendation or communication to the client with respect to any security which such other divisions or advisory representatives may purchase or sell (either as principal or for any other client's account) or recommend to any other client, or in which such other divisions or advisory representatives , or their respective principals, employees, affiliates or their family members, may engage in transactions.

j) **Both advisory and brokerage clients of Stephens have the ability to borrow money against the collateral value of their accounts with non-purpose loans arranged through Stephens with a third party bank. Stephens receives an administrative fee which is paid by the third party bank in an amount which varies but can be up to 1.35% of the monthly outstanding balance of the client's loan. Part of the administrative fee is passed along to Stephens FCs or IARs, and this can create a conflict of interest. Since Stephens has not compared rates available elsewhere, clients may be able to obtain lower interest rates on their loans through other banks.**

k) Stephens, Pershing, and IntraFi receive fees and benefits for services provided in connection with the Bank Sweep Program. Stephens offers the Bank Sweep Program as a service and is not obligated to offer you this or any sweep product or to make available to you a sweep product that offers a rate of return that is equal to or greater than other comparable products or investments. Stephens has an economic incentive to make available to our clients sweep options that are more profitable to us than other sweep options.

Each Program Bank will pay Stephens a fee equal to a percentage of the average daily deposit balance in your Deposit Accounts at the Program Bank. Because the Program Banks pay different amounts, the compensation paid to Stephens will vary from Program Bank to Program Bank. Because the interest rates paid to clients are subject to tiers based on the aggregate value of accounts within the client's Household Balance, Stephens' compensation rate is higher on client's cash in lower interest rate tiers and lower on client's cash balances in higher rate tiers. Stephens may reduce its fee and may vary the amount of the reductions between clients.

The interest rate applicable to your Deposit Accounts is determined by the amount of interest participating banks are willing to pay on the aggregate balance of the deposits minus (i) the fees paid to Intrafi Network, LLC, as administrator, (ii) the fees paid to Pershing for its services, and (iii) the fees paid to Stephens. Stephens retains and exercises the right to negotiate its own fee and may reduce or increase its fee. Because an increase in fees to Stephens reduces the effective amount of the interest rate that is ultimately paid to customers, Stephens has a conflict of interest with regard to the Bank Sweep Program.

The rate tier applicable to your Deposit Accounts is determined based on your Household Balance as of the first business day following the fifteenth (15th) of the month.

Stephens charges advisory accounts an investment advisory fee based on a percentage of client assets. In computing your investment advisory fee, cash balances in the Bank Sweep Program are included in the assets of your account when calculating the investment advisory fee earned by Stephens for management of your account. Therefore, Stephens is paid both its fee from the Program Banks on the Bank Sweep Program balance in your account, and, **in addition**, Stephens earns an investment advisory fee for your total balances in your account, including your balance in the Bank Sweep Program. This creates a conflict of interest, as Stephens earns more from Bank Sweep Program balances in investment advisory accounts than it would if such balances were held outside of the Bank Sweep Program or outside of the investment advisory account entirely, creating an economic incentive for Stephens to retain advisory assets in cash in the Bank Sweep Program.

Your FC or IAR does not receive a portion of the fee paid to Stephens by the Program Banks.

Advisory Services

Clients in the SMID Core program are choosing to invest a portion of their assets in a program managed pursuant to the portfolio manager's investment strategy rather than a unique program tailored for their particular investment circumstances. Clients can impose reasonable investment restrictions on the Portfolio Manager of their account, such as restrictions on investing in particular securities or types of securities or restrictions on investing in particular industries.

Stephens and Pershing will not charge commissions on securities transactions that are executed through Stephens or Pershing for these accounts. Your account would be responsible for paying any commission charges imposed by any other brokerage firm on any securities transactions executed through any other brokerage firm, and such charges would be in addition to the wrap fee and any other applicable charges incurred by your account. By executing trades through Stephens with Pershing, your account might forego benefits, such as participation in block trades or negotiated transactions that might be available through other brokerage firms.

Stephens Insured Bank Sweep Program

Stephens makes available to clients whose accounts are custodied at Pershing the opportunity to participate in the Bank Sweep Program. In this program all of the uninvested cash in a client's account is automatically deposited, or "swept" into FDIC insured, interest-bearing deposit accounts at one or more banks which participate in the Bank Sweep Program. None of the Program Banks participating in the Bank Sweep Program are owned by or affiliated with Stephens. When a client signs an account agreement with Stephens, participation in the Bank Sweep Program is automatic unless the client elects not to participate and "opts out" of the Bank Sweep Program. For more information about the Bank Sweep Program please review these important disclosures at www.stephens.com/investment-disclosures/ which are incorporated by reference into this Form ADV Part 2A brochure.

Stephens offers the Bank Sweep Program as a service and is not obligated to offer this or any sweep product. The interest rates paid on Deposit Accounts at a Program Bank will usually be lower than prevailing market interest rates and returns on other investment alternatives.

The Bank Sweep Program is not available to ERISA plans with accounts at Stephens such as employee benefit plans, retirement plans, defined contribution plans, defined benefit plans (collectively, "ERISA accounts"), or to traditional and rollover IRA accounts, Roth, SEP, SIMPLE, and inherited IRAs; Keogh plans; and Coverdell education savings accounts.

The Bank Sweep Program is designed to temporarily hold cash balances in your investment account and is not designed to act as a retail bank account, nor a long-term, ongoing investment option. If

you desire, as part of an investment strategy or otherwise, to maintain a cash position in your Stephens account for other than a short period of time and/or are seeking the highest yields currently available in the market for your cash balances, please contact your FC or IAR to discuss investment options that are available outside of the Bank Sweep Program to help maximize your potential return consistent with your investment objectives, liquidity needs and risk tolerance. Please note, however, that available cash accumulating in your Stephens account will not be automatically swept into any investment you purchase outside of the Bank Sweep Program.

Nothing obligates you to participate in the Bank Sweep Program. The rate of return on money deposited through the Bank Sweep Program will usually be lower than prevailing market interest rates and returns on other investment alternatives.

Each Deposit Account constitutes a direct obligation of the Program Bank and is not directly or indirectly an obligation of Stephens or Pershing. Stephens and Pershing do not guarantee in any way the financial condition of the Program Banks or the accuracy of any publicly available financial information concerning such Program Banks. You are responsible for monitoring the total amount of deposits that you hold with any one Program Bank, directly or through an intermediary, in order for you to determine the amount of deposit insurance coverage available to you on your deposits. Stephens and Pershing are not responsible for any insured or uninsured portion of a Deposit Account.

Restrictions

In this program, you can impose reasonable restrictions on account investments. For example, you may restrict Stephens from buying specific securities, a category of securities (e.g., tobacco companies) or Fund shares. If you restrict a category of securities, we will determine which specific securities fall within the restricted category. In doing so, we can rely on outside sources (e.g., standard industry codes and research provided by independent service providers). Any restrictions you impose on individual securities have no effect on Fund holdings since Funds operate in accordance with the investment objectives and strategies described in their prospectuses. In this program, the portion of the account that would have been invested in any restricted security or category of securities will be invested in cash or cash equivalents. This will impact the performance of the account relative to an account that is fully invested in securities.

Wrap Fee Programs

In addition to other indications of individual ownership, including the right to withdraw, hypothecate, vote, or pledge securities held in the wrap fee client's account, a wrap fee client has the ability to place reasonable limitations and/or restrictions on the investments in their portfolio. Where reasonable restrictions are imposed, Stephens will manage the client's portfolio investments to comply with these restrictions, but the investment performance of the client's account will likely differ (positively or negatively) from other clients following a similar investment strategy, that is not subject to the same restrictions. The minimum account size for wrap fee programs varies from program to program, and a person considering a wrap fee program should review the disclosure document provided by Stephens of the applicable program for details regarding the operation of the program, its risks, fees, and other charges. In the SMID Core program, the entire wrap fee is paid to Stephens for its services related to each wrap fee account.

In determining the suitability of an investment strategy for a particular wrap fee program client, we rely on the information provided by the client regarding the financial objectives of the client for each account. This information comes from, among other sources, personal interviews with the client and written questionnaires completed by the client and other communications with the client or its representative regarding the client's situation, investment objectives, risk tolerances and investment restrictions, if any. Our strategies are not appropriate for all investors, and investors should only invest a portion of their portfolio in these programs.

In separately managed accounts Stephens advises, SIMG has the discretionary authority to determine the securities, and the amount of securities, to be bought and sold for our clients without obtaining specific client consent. The discretionary authority regarding investments may, however, be subject to certain reasonable restrictions and limitations placed by the client on transactions in certain types of securities or industries, restrictions or limitations imposed by applicable regulations.

Performance-Based Fees and Side-By-Side Management

Stephens typically charges clients an investment advisory wrap fee based on the value of the assets in the client's account. On occasion, Stephens enters into performance fee arrangements with appropriate clients as discussed below. Only certain clients qualify for performance fee arrangements which compensate Stephens based, in part, on the performance of the client's account.

All fees are negotiable and vary depending on the size of the investment, the nature of the services to be rendered by Stephens to the client, and other factors. Performance-based fees are typically invoiced annually.

Stephens only enters into performance fee arrangements with certain clients which are eligible to enter into these arrangements as defined in Rule 205-3 under the Investment Advisers Act of 1940 and in accordance with the requirements set forth in applicable laws, rules and regulations, and these arrangements are negotiated with the client on an individualized basis. The performance fee arrangement could create an incentive for Stephens to seek to maximize the investment return by making investments that are subject to greater risk, or are more speculative, than would be the case if Stephens' compensation were not based upon the investment return or could create an incentive for Stephens to seek to limit investment returns by pursuing investments with reduced risk. With a performance fee arrangement Stephens' fee is, in part, contingent upon the returns on the client's assets, which are computed based upon unrealized and realized appreciation or depreciation of client's assets. This gives Stephens an incentive to favor performance fee accounts with investment opportunities and therefore creates a conflict of interest for Stephens.

Accounts participating in a performance fee arrangement may pay Stephens more compensation, or less compensation, when compared to standard fee rates. Performance fee arrangements are not available for all investment accounts and must be approved by Stephens on a case-by-case basis. Performance fee rates are negotiable. A client may negotiate a base fee rate, performance fee rates, an index to be used to calculate the performance fee, or the use of no index in calculating the performance fee.

Any performance fee that Stephens charges is intended to comply with Rule 205-3 and other applicable requirements under the Investment Advisers Act of 1940. Stephens has an incentive to favor accounts which it charges a performance fee over other types of client accounts by allocating more profitable investments to performance fee accounts or by devoting more resources toward the accounts' management. Stephens seeks to mitigate the potential conflicts of interest which arise from managing accounts that bear a performance fee through its policies and procedures, including those related to investment allocation, and by complying with the provisions of Rule 205-3 as stated above. Stephens has discretion not to accept these arrangements.

Methods of Analysis, Investment Strategies and Risk of Loss

Stephens utilizes street and independent sources for our research, but it is not the sole basis of our investment decision making process. Other sources of information we utilize can include industry data obtained from subscription services, company filings, street research and models. Stephens utilizes these services for real-time news and pricing. Stephens also utilizes other independent research sources for quantitative reports that measure such things as price changes, growth rates, profitability, valuation, earnings surprises and earnings revisions. These quantitative reports are used to help identify new securities that meet our investment criteria and to monitor existing holdings.

Investing in securities involves risk of loss that clients should be prepared to bear. The material risks associated with our strategies are:

Equity Market Risk – Overall stock market risks affect the value of the investments in equity strategies. Factors such as U.S. economic growth and market conditions, interest rates, and political events affect the equity markets.

Money Market Risk - An investment in a Money Market Fund is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency. Although the fund seeks to preserve the value of your investment at $1.00 per share, it is possible to lose money by investing in the fund. Yields will vary. Yield quotations more closely reflect the current earnings of the fund than the total return.

Management Risk - Our judgments about the attractiveness and potential appreciation of a particular asset class, mutual funds or individual security may be incorrect and there is no guarantee that individual securities will perform as anticipated. The price of an individual security can be more volatile than the market as a whole and our investment thesis on a particular stock may fail to produce the intended results.

Small Cap and Mid Cap Company Risk - Investing in small cap and mid cap issuers involves a significantly greater risk than investing in larger, more established companies. The daily trading volume for small cap and mid cap issuers can be much lower than for more widely held, established companies. There may be periods when it is difficult to invest in or liquidate portfolio investments for our various investment strategies. This is particularly the case when breaking news on a company occurs or when significant market forces and events occur. In addition, small and mid-cap companies are more vulnerable to economic, market and industry changes. Because smaller companies often have limited product lines, markets or financial resources, or may depend on a few key employees, they may be more susceptible to particular economic events or competitive factors than larger capitalization companies.

Investors should only invest a portion of their total portfolios in these securities, and investors should be prepared to lose their entire investments.

Certain Risks Associated with Cybersecurity

With the increased use of technologies such as the Internet to conduct business, investment advisers, including Stephens, rely in part on digital and network technologies (collectively, "cyber networks"). These cyber networks are susceptible to operational, information security and related risks and can be at risk of cyber-attacks. Cyber-attacks could seek unauthorized access to cyber networks for the purpose of misappropriating sensitive information, corrupting data, or causing operational disruptions.

Cyber-attacks can potentially be carried out against the issuers of securities you have invested in, against third party service providers, or against Stephens itself by persons using techniques that range from efforts to circumvent network security, overwhelm websites, and gather intelligence through the use of social media in order to obtain information necessary to gain access to cyber networks. Although cyber-attacks potentially could occur, Stephens maintains an information technology security policy and technical and physical safeguards intended to protect the confidentiality of internal data.

Risks Associated with Artificial Intelligence

Stephens can be expected to utilize enterprise tools and systems that include or incorporate artificial intelligence ("AI"), machine learning, probabilistic modeling, and other data science technologies (collectively, "AI Tools") to assist in formulating commentary, research materials, investment insights, investment advice, or client communications. The use of AI Tools is only supportive of the advisor's investment-advice process and does not replace the professional judgment of the advisor. Stephens does

not use AI Tools to automate investment decisions, select securities, or determine portfolio constructions. All investment decisions are made by human investment professionals. Stephens' policies and procedures require all AI Tool-assisted outputs, including those used in assisting with the investment advice process, to be reviewed by a human before such outputs inform recommendations or investment decisions or are otherwise disseminated.

AI Tools depend on the collection and analysis of large amounts of data and are highly complex. While reasonable efforts are made to verify the accuracy of information presented, AI Tools can produce outputs that contain incomplete, inaccurate, outdated, or misleading information. Stephens is not in a position to control the manner in which third-party AI Tools are developed or maintained. However, Stephens has implemented policies and procedures designed to mitigate these risks by requiring employees to take training on the proper use of AI Tools; requiring human review prior to dissemination of AI-generated or AI-assisted content; and prohibiting the use of publicly available AI Tools.

The use of AI Tools is subject to Stephens' vendor approval policies and procedures, including risk-based review and oversight prior to deployment. Stephens requires its employees to use enterprise versions of AI Tools, or other approved AI Tools, that are designed to prevent data or information entered into the AI Tool from becoming public or being used to "train" the AI Tool. However, Stephens is unable to eliminate or mitigate all risks associated with the use of AI Tools.

The legal and regulatory environment relating to AI is uncertain and could rapidly evolve. This may impact how Stephens uses AI, increase compliance costs, and increase the risk of non-compliance. Any of these risks could adversely affect Stephens as well as the models, platforms, and accounts advised by Stephens. There is also risk exposure arising from the use of AI by bad actors to commit fraud, misappropriate funds, or facilitate cyberattacks.

Bank Sweep Program

If you have on deposit through the Bank Sweep Program an amount of cash that exceeds the number of Program Banks multiplied by $250,000, the balances in excess of this amount will not be insured by the FDIC. In the event of a failure of a bank participating in the Bank Sweep Program, there may be a time period during which you may not be able to access your cash. If you have cash at a bank outside the Bank Sweep Program, this may negatively impact the availability of FDIC insurance for the total amount of your funds held within and outside the Bank Sweep Program. You are responsible for monitoring the total amount of deposits that you hold with any one Program Bank, directly or through an intermediary, in order to determine the extent of FDIC insurance coverage available to you on your deposits, including the Deposit Accounts.

Policies and Procedures for Proxy Voting

Stephens will make available information of the firm's proxy voting policy and procedures including information regarding how Stephens voted proxies, if requested. In response to any request as to how the client's proxies were voted, the Chief Compliance Officer or his designee would provide the information to the client.

Unless directed otherwise, SIMG will vote proxies for the securities held in SMID accounts in the manner it determines to be in the best interest of the SMID account clients.

Clients may obtain a copy of SIMG's Proxy Voting Policy and/or information on how SIMG voted the client's securities upon written request sent to SIMG, LLC.

If the client chooses to have their securities custodied away from Pershing it will be the responsibility of the client to vote or to arrange for the voting of their proxies.

Corporate Actions and Other Matters

From time to time there may also be a variety of corporate actions or other matters for which shareholder action is required or solicited and with respect to which Stephens may take action that it deems appropriate in its best judgment except to the extent otherwise required by agreement with the client. These actions include, for example and without limitation, responding to tender offers or exchange offers, bankruptcy proceedings and proposed class action settlements. However, Stephens will have no power, authority, responsibility or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in the client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets.

Item 7 Client Information Provided to Portfolio Managers

In the SMID Core program, Stephens acts as the registered investment adviser establishing a separate account for the client. A separate account is a portfolio of individual securities privately managed by a Sub-Advisor. The FC or IAR assists clients in determining whether the SMID Core program is suitable for a portion of their overall portfolio. The FC or IAR assigned to the account and support personnel have access to the client's data maintained by Stephens, and the client's financial information and other data is available to SIMG.

Stephens maintains client information and objectives for the SMID Core program. A Stephens account application and agreement must be completed by each client and maintained by Stephens. The Stephens account application contains account name and address, investment objectives and specific financial information. Client information may be updated from time to time upon notification to Stephens of any material changes and noted within the client's file.

Additionally, we advise wrap fee accounts in various programs sponsored by affiliated and unaffiliated investment advisers. The sponsor establishes a minimum account size for each program, and you should refer to the sponsor's wrap fee brochure for a discussion of minimum account sizes and whether the minimum account size can be waived.

Information regarding each client's financial situation and investment objectives is made available to the Portfolio Managers upon its initial receipt from the client and when it is updated.

Item 8 Client Contact with Portfolio Managers

The Stephens FC or IAR assigned to the client's account is the client's primary point of contact with Stephens. The Stephens FC or IAR offers to discuss or meet no less frequently than annually with SMID Core program clients. Clients are encouraged to contact the Stephens FC or IAR at any time if they have questions or would like to have additional discussions or meetings.

If you have experienced any changes regarding your financial status, investment objectives or risk tolerance, please contact your FC or IAR to see if any adjustments are necessary to your investment strategy.

Clients in the SMID program are not restricted in their ability to contact or consult with SIMG regarding their SMID account.

Item 9 Additional Information

Disciplinary Information

Stephens voluntarily participated in the SEC's Share Class Selection Disclosure Initiative, and on March 11, 2019 the SEC entered a Cease and Desist Order against Stephens in which Stephens neither admitted nor denied the allegations of the SEC's Order. The Order alleged that Stephens did not fully disclose conflicts of interest related to the selection of mutual fund share classes for its advisory clients, and that Stephens purchased, recommended or held mutual fund share classes for client accounts which paid Stephens 12b-1 fees when less expensive share classes of the same funds were available which did not pay Stephens these 12b-1 fees. The Order directed Stephens to Cease and Desist from committing or causing any violations and any future violations of Sections 206(2) and 207 of the Investment Advisers Act of 1940 and ordered that Stephens be censured and pay disgorgement and prejudgment interest to advisory clients who held these more expensive mutual funds share classes in their advisory accounts. (IA Release No. 40-5196)

In its capacity as a broker/dealer, Stephens has been subject to legal or disciplinary events in the ordinary course of its business, such as regulatory sanctions relating to compliance with broker/dealer trade reporting requirements and other regulatory actions.

Affiliations

Stephens, from time to time, enters into arrangements with other broker-dealers, investment advisers or other persons whereby such parties refer clients seeking advisory services to Stephens.

For additional information regarding Stephens' affiliations, please see Item 6 "Conflicts of Interest" above.

Code of Ethics

Stephens has adopted an Investment Advisory Code of Ethics ("Code of Ethics"), which defines the requirements and expectations for the business conduct of all of its investment advisory employees, including employees of Stephens.

Furthermore, all Stephens' employees are expected to adhere to Stephens' Mission and Values Statement and Code of Professional Conduct.

The fundamental position of Stephens is that all aspects of its business are to be conducted in an ethical and legal manner in accordance with federal law and the laws of all states where the investment advisory divisions do business. In accordance with that position general principles apply:

- The interests of Stephens' clients are our first consideration. Any personal securities transaction, which would be detrimental or potentially detrimental to any client account and any personal securities transaction, which is designed to profit by the market effect of any client account, must be avoided.
- All personal securities transactions should be conducted in such a manner as to be consistent with the Code and to avoid actual or potential conflicts of interest or abuse of a Stephens' employee's knowledge of customer information or customer transactions.
- Investment adviser personnel should not take inappropriate advantage of their positions. Information concerning the identity of security holdings and financial circumstances of clients is confidential.
- Independence in the investment decision-making process is paramount.

Accordingly, there are certain standards of conduct which Stephens' investment advisory employees follow to reduce potential conflicts with the interests of our clients. Stephens will provide a copy of the Code of Ethics to any client or prospective client upon request.

Conflict of Interest with Personal Trading and Client Trades
To minimize potential conflicts of interest, advisory personnel who determine or approve what recommendations will be made for client accounts will not participate in Stephens' proprietary trading activities and will not know what trading strategies are employed for its proprietary accounts.

Stephens allows employees to make purchases in the marketplace of securities owned by any client account, provided that such purchases are made in amounts consistent with the normal investment practice of the person involved. Such purchases must be made after the investment advisory accounts managed by such employee (or in the management of which such employee participates) has completed its transactions in such securities.

Stephens Personal Trading
Stephens' personnel may not participate in initial public offerings. All employees are required to maintain their personal accounts and accounts in which they have a beneficial interest at Stephens unless the account has been specifically exempt in writing from this requirement. Stephens' employees are required to provide copies of all of their trade confirmations and brokerage account statements to Stephens' Compliance Department in order to permit the monitoring of compliance with personal trading policies and restrictions. Additionally, employees are required to report all personal securities transactions no less frequently than quarterly. Stephens' Code requires employees to report violations of the Code to the Stephens Chief Compliance Officer or their designee.

Supervision and Review of Accounts
The SMID Core program is overseen by Joseph Warren Simpson, or his designee who serves as Stephens' Supervisory Principal for the SMID Core program.

Client account review reports are prepared and provided to clients on a quarterly basis. The quarterly review reports disclose all transactions and the performance of each component of the account. The FC or IAR assigned to a client's account will be the primary contact for the client at Stephens. The FC or IAR will offer to meet with clients periodically to discuss their investment portfolio and investment goals, but no less frequently than annually. Clients are encouraged to contact their Stephens FC or IAR at any time if the client would like to have additional discussions or meetings.

Primary responsibility for the supervision of these accounts lies with the Supervisory Principal, Warren Simpson and/or his designee. Mr. Simpson is responsible for serving as liaison between Stephens FC or IAR and SIMG. Mr. Simpson, or his designee, also coordinates account set up and client profile reviews and account implementation.

The Supervisory Principal responsibilities are to review client accounts and coordinate with Stephens' FCs or IARs regarding account performance and suitability. Internal Stephens' reports and reports from the FCs or IARs and SIMG are relied upon in the overall review process.

Supervisory Principals are responsible for supervisory approval of new advisory accounts, the daily review of trading activity and periodic reviews of performance utilizing various other daily and monthly exception reports.

When Stephens executes a transaction for you through a Pershing order execution system, you will receive a written or electronic confirmation of the transaction which provides information regarding the transaction. You will also receive a written or electronic monthly account statement if you had activity in your account

during the month which will detail the activity and the positions in your account. If you have not had any activity during the month and you have positions in your account, you will receive a written or electronic quarterly account statement which details the positions in your account.

You may waive the receipt of account statements or confirmations after each trade in favor of e-delivery via https://stephensaccess.netxinvestor.com/. You may also receive mutual fund prospectuses, where appropriate.

In addition, we provide account reports for client accounts reflecting account holdings and account performance on a quarterly basis.

Client Referrals and Other Compensation

Neither Stephens nor any of our employees receive sales awards or other prizes from any non-affiliated outside parties for providing investment advice to our clients.

Stephens may enter into referral arrangements with its affiliates or between divisions of the Firm. This includes referrals to Stephens of prospective clients seeking investment advisory services. If the referral results in a new account relationship, then a portion of the net revenue from such account is paid to such entity or division as a referral fee, and such entity or division may pay some portion of the fee to the referring person. This arrangement is disclosed to the client and does not result in any additional fees or charges to the client. Such arrangements are conducted in accordance with the Marketing Rule, as applicable, and the Advisers Act generally.

FCs and IARs are eligible to receive referral fees for referring eligible clients to the Stephens Investment Banking division. For eligible investment banking referrals, referring parties are eligible to receive compensation as a percentage of net income earned by Investment Banking. Therefore, FCs and IARs are incentivized to refer clients to the Investment Banking division. Any such compensation to the FC or IAR is at the discretion of the Firm.

FCs or IARs who join Stephens are eligible to receive a financial incentive package. The incentive package is designed to discourage FCs and IARs from leaving Stephens and transferring client accounts to another firm during their tenure. The amount of the financial incentive package is determined by Stephens' assessment of the FC's or IAR's perceived value as a new hire.

There are no formal revenue or production requirements, nor are there specific requirements regarding the transfer of a set number of client accounts or assets. However, all FCs and IARs are expected to maintain good standing with the firm, which entails among other things properly servicing client accounts, recruiting new business, and upholding a clean compliance record.

Apart from Stephens' investment advisory services to its advisory clients, Stephens' Investment Banking business receives compensation from sponsors and investment advisers to private funds in exchange for placement agent, referral or other fundraising services.

Financial Information

Stephens does not require or solicit prepayment of more than $1,200 in fees per client six months or more in advance and, thus, has not included a balance sheet of its most recent fiscal year. Stephens is not aware of any financial condition that is reasonably likely to impair our ability to meet our contractual commitments to our clients.

Who to Contact

We are pleased to have an opportunity to serve as your investment adviser. If you have any questions about the information contained in this brochure or about any aspect of the services we provide, please do not hesitate to call Stephens at (877-891-0095). Clients often receive this information by electronic delivery.

The Stephens ADV and additional brochures are available at www.stephens.com/investment-disclosures. To access your FC or IAR's SEC Adviser Biography, go to www.stephens.com, use the search bar in the top right corner of the home page and search by your FC's or IAR's name. SEC Adviser Biographies are also available in the "Our Team" section and are there for your review.

Definitions and Professional Designation Qualifications

Accredited Investment Fiduciary® (AIF®)
The Accredited Investment Fiduciary® (AIF®) designation signifies specialized knowledge of fiduciary responsibility and prudent investment practices. Individuals earning the AIF® designation must complete a formal training program covering fiduciary standards of care, pass a comprehensive examination, meet experience requirements, and submit an application for accreditation. Designees are required to complete continuing education annually and adhere to ethical and professional standards established by the issuing organization.

Accredited Wealth Management Advisor℠ (AWMA®)
The Accredited Wealth Management Advisor℠ (AWMA®) designation is awarded to professionals who complete coursework focused on wealth strategies, investment planning, tax-aware strategies, and asset protection techniques. Candidates must pass a comprehensive examination assessing applied knowledge. Designees agree to comply with standards of professional conduct and complete ongoing continuing education to maintain the designation.

Chartered Financial Analyst® (CFA®)
The Chartered Financial Analyst® (CFA®) designation is awarded by CFA Institute to investment professionals who satisfy extensive education, examination, experience, and ethical requirements. Candidates must pass three levels of rigorous examinations covering topics such as ethics, economics, financial reporting, investment analysis, and portfolio management, and must obtain qualifying professional experience. CFA® charterholders are required to adhere to a strict code of ethics and complete continuing professional education.

CERTIFIED FINANCIAL PLANNER™ (CFP®)
The CERTIFIED FINANCIAL PLANNER™ (CFP®) designation is granted by the Certified Financial Planner Board of Standards, Inc. Professionals earning the CFP® designation must complete approved coursework in comprehensive financial planning topics, pass a comprehensive examination, hold a bachelor's degree, and demonstrate relevant professional experience. CFP® professionals must meet ongoing continuing education and ethics requirements to maintain the designation.

Chartered Financial Consultant® (ChFC®)
The Chartered Financial Consultant® (ChFC®) designation indicates advanced education in comprehensive financial planning, including insurance planning, taxation, retirement, and estate planning. Candidates must complete a required curriculum and demonstrate relevant professional experience. Designees agree to adhere to a professional code of ethics and complete ongoing continuing education requirements to maintain the credential.

Certified Investment Management Analyst® (CIMA®)
The Certified Investment Management Analyst® (CIMA®) designation reflects specialized knowledge in investment management consulting, including asset allocation, manager selection, performance measurement, and risk management. Candidates must meet experience requirements, complete an approved education program, and pass a certification examination. CIMA® professionals must adhere to ethical standards and complete continuing education, including ethics education, to maintain certification.

Certified Pension Consultant (CPC)
The Certified Pension Consultant (CPC) designation represents advanced expertise in the design, administration, and maintenance of qualified retirement plans. Individuals must complete a series of examinations, meet industry experience requirements, and comply with ethical standards. Designees are

required to complete continuing education and maintain credentialed membership status to retain the designation.

Certified Portfolio Manager® (CPM®)
The Certified Portfolio Manager® (CPM®) designation signifies education and training in portfolio management, security analysis, asset allocation, and fiduciary responsibility. Candidates must meet education or experience criteria, complete required coursework, and fulfill professional conduct and continuing education obligations to maintain the designation.

Certified Public Accountant (CPA)
Certified Public Accountants (CPAs) are licensed professionals regulated by state boards of accountancy. Licensure generally requires completion of extensive college-level education, a specified period of supervised professional experience, and successful completion of the Uniform CPA Examination. CPAs must satisfy ongoing continuing professional education requirements and follow professional ethical standards to maintain licensure.

Chartered Retirement Planning Counselor℠ (CRPC®)
The Chartered Retirement Planning Counselor℠ (CRPC®) designation indicates focused education in retirement planning, including pre-retirement, post-retirement, asset management, and estate considerations. Candidates must complete required coursework and pass an examination. Designees must satisfy continuing education requirements and adhere to professional conduct standards to maintain the designation.

Chartered Retirement Plans Specialist℠ (CRPS®)
The Chartered Retirement Plans Specialist℠ (CRPS®) designation signifies specialized training in the design, implementation, and maintenance of employer-sponsored retirement plans. Candidates must complete approved coursework, pass an examination, and fulfill continuing education and ethical requirements to renew the designation periodically.

Qualified Plan Financial Consultant (QPFC)
The Qualified Plan Financial Consultant (QPFC) credential reflects knowledge of qualified retirement plans, including plan design, administration, compliance, fiduciary responsibilities, and ethical considerations. Candidates must complete required coursework, pass an examination, agree to adhere to a code of professional conduct, and complete ongoing continuing education annually to maintain the credential.