

## Regulation Best Interest Potential Conflicts of Interest

### New Accounts

#### Introduction

S.L. Reed & Company (SLR) 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). We are an introducing broker-dealer, with clearing services provided by National Financial Services, LLC (NFS). Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

#### What investment services do we provide?

We are a full service broker dealer offering investment and insurance products to retail investors, including buying and selling equities, options, mutual funds, fixed income, fixed and variable annuities, and life insurance. In addition, SLR offers retirement plan services, whereby employers can offer a menu of investment plan selections to their eligible employees. Upon request, we can refer eligible clients to our affiliated Registered Investment Advisor, Windward Capital Management (Windward), or another investment advisor, that would provide additional investment services. We have no stated account minimums for brokerage accounts, but Windward does have stated minimums for advisory accounts.

#### Potential Conflicts of Interest

Due to the fact that SLR is an affiliate of Windward, and some of our representatives are also Investment Advisor Representatives of Windward, we may have an incentive to direct eligible customers who meet Windward's minimum asset requirements, to open an investment advisory account with Windward.

Whether you choose our brokerage services, or the Investment Advisory services of Windward, different types of investment choices may provide SLR or our representatives with different levels of compensation. They may therefore have incentive to offer certain products or types of investments.

#### How We Eliminate or Mitigate Conflicts of Interest

We prohibit any sales contest that would provide representatives incentive to offer one product or service over another, or the products and services of one vendor over another. During our discussions with you regarding opening a new account, we discuss the various options for your investment account. We discuss and document, at minimum:

- Your investable assets, and what proportion such assets comprise your overall assets.
- Your overall investment profile, including your investment objectives, time frame, and level of investment experience and sophistication.
- Your desire for a discretionary investment advisory account versus a self-directed option.
- The overall potential costs and fees of an advisory account versus a per transaction fee arrangement, and other fees and expenses.
- Ease of access to funds, and ease of transfer between funds.
- Reputation, strength, and range of services provided by the custodial company.
- Tax treatment and ability to provide tax advantaged handling in the various account types.
- Any other relevant factors, including your personal preferences.

We believe the information collected in this discussion will provide us with the ability to help you make an informed choice as to the type of account that is in your best interest.