

Regulation Best Interest

Disclosure/Potential Conflicts of Interest

Individual Securities Recommendation

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.

Securities Recommendations

We are committed to assisting you in determining the investment amount, timing, strategies and products that are in your best interest. This commitment exists when you first establish your account, and continues any time we make an investment recommendation.

We may agree to provide account monitoring, or you may hold your account on a completely self directed basis. If we agree to provide account monitoring, we are required to disclose the terms of the account monitoring agreement, and all recommendations made, including recommendations to make no changes (“hold” recommendations), must be made in your best interest.

Potential Conflicts of Interest

When you choose our brokerage services, 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.

Some investments, including trading in equities, fixed income, and options, provide compensation to SLR and our representatives on a commission per transaction basis. This compensation method may give SLR or our representatives incentive to recommend that you increase the frequency of trades placed in your account.

How We Eliminate or Mitigate Conflicts of Interest

We prohibit all sales contests that would give representatives incentive to offer one type of product or conduct trades in one security type over another. Whenever making a recommendation of investment products, we consider the following, 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 risk tolerance for this potential investment and your overall tolerance for risk.
- Your current investment allocation, and the current recommendation's impact on your allocation.
- 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 frequently use the information collected upon opening your account to make recommendations. However, recommendations made over the course of your relationship with us should also include:

- Recent changes to your financial situation.
- Current needs for liquidity of funds.
- Updated time horizon for your investments.
- Changes in the current investment environment which might affect your investment strategy.
- Changes to your tax situation or the tax environment.
- Other factors specific to the time of the recommendation.

We use the following procedures to guard against excessive trading:

- A member of our operations staff confirms the accuracy of each transaction the following morning.
- A principal of our firm approves each transaction daily.
- A principal of our firm samples and monitors accounts to watch for excessive trading.
- If an unusual number of trades are suspected, we require the representative to submit rationale for each transaction.

We believe these methods will provide us with the ability to help you make a selection in investment products that is in your best interest.