

## Important Disclosure Information

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## Historical Performance

Historical performance results for investment indices and/or categories may have been provided for general comparison purposes only and generally do not reflect the deduction of transaction and/or custodial charges, the deduction of an investment management fee or the impact of taxes incurred, both of which would have the effect of decreasing historical performance results. It should not be assumed that your account holdings do or will correspond directly to any comparative indices.

## Phishing Disclaimer

Phishing is a form of online identity theft. Phishing scams can be difficult to differentiate from a legitimate communication. In a phishing scam, the email or linked website may look authentic, with the same logos, fonts, and colors of the company's actual site. It may even include links to the legitimate site to further your confusion. This website, however, is bogus and set up to steal your information. Please note that SIA will never request you to enter or update personal information through email or a link to a website.

If you receive an e-mail message that appears to be from SIA, but suspect that it is not a legitimate communication, we recommend you take the following steps:

1. DO NOT respond to the e-mail under any circumstances.
2. Forward the e-mail in its entirety to [info@sovereignfinance.com](mailto:info@sovereignfinance.com)
3. Delete the e-mail upon forwarding to SIA.

## Vishing Disclaimer

Vishing operates like phishing by persuading consumers to divulge their Personally Identifiable Information, claiming their account was suspended, deactivated, or terminated. Recipients are directed to contact their financial institution or bank via a bogus telephone number provided in the e-mail or by an automated recording. SIA will never request you to update information in this manner.

*If you have a question concerning your account with SIA you should contact us using a telephone number obtained independently from the email or voicemail.*

### **Centre for Fiduciary Excellence™ (CEFEX®)**

An independent global assessment and certification organization. CEFEX works closely with investment fiduciaries and industry experts to provide comprehensive assessment programs to improve risk management for institutional and retail investors. CEFEX certification helps determine trustworthiness of investment fiduciaries.

#### **CEFEX Certification**

CEFEX® defines CEFEX Certification as independent recognition of a firm's conformity to Practices and Criteria within the Standard of Excellence. It implies that a firm can demonstrate adherence to the industry's best practices and is positioned to earn the public's trust. The CEFEX Certification process requires the Candidate to undergo a five-step process, which includes: website registration and submission of a \$300 administrative fee; signing an assessment agreement and submitting an assessment fee; submitting documents for the assessment; undergoing a 1-day onsite visitation by a CEFEX Analyst to review documents and conduct interviews; and a review of the recommendation by the CEFEX Analyst and approval by the CEFEX Registration Committee. A voluntary annual audit by an independent fiduciary expert is required for SIA to retain its CEFEX Certification.

#### **Global Fiduciary Standard of Excellence (GFSE)**

Per fi360, the GFSE is established by "Prudent Practices", "Criteria" and "Substantiation", which are organized under a Four-Step Fiduciary Quality Management System. The steps are consistent with the global ISO 9000 Quality Management System standard, which emphasizes continual improvement. The steps are (1) organize, (2) formalize, (3) implement, and (4) monitor. For more information about the GFSE visit [https://www.fi360.com/main/pdf/handbook\\_advisor.pdf](https://www.fi360.com/main/pdf/handbook_advisor.pdf).

#### **Disclosure**

SIA has been a CEFEX-certified firm since May 2, 2017. In order to acquire a CEFEX certification, SIA was required to pay an initial assessment fee. Fees range from \$5,000 to \$20,000 depending on the size and complexity of the firm. Factors considered include AUM, number and type of clients, number of locations, and 3(38) roles. The assessment fee does not have any bearing on the recommendation for certification by the CEFEX Registration Committee. To learn more about CEFEX and the CEFEX Certification, visit [www.cefex.org](http://www.cefex.org).