

As of June 30, 2020

This Regulation Best Interest Disclosure Statement (“Reg BI Statement”) provides information about Supreme Alliance LLC (“SAL,” “us,” “our,” or “we”). If you have any questions about the contents of this Reg BI Statement, please contact us at 561-460-2870 or by email us at: compliance@supremealliancellc.com. This Reg BI Statement is applicable to retail customers for whom we are acting as broker. If you are not a retail customer and would like additional information regarding the services provided to you by SAL, please contact your SAL Broker (as defined below).

General Information regarding SAL

SAL 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”). SAL registered as an investment adviser with the Securities and Exchange Commission; therefore, it does act as an investment adviser.

Supreme Alliance LLC provides investment solutions – mutual funds, variable annuities, and investment advisory products– to institutions and individuals.

SAL’s brokerage services, provided by both the Firm’s sales agents in their capacity as associated persons of SAL (“SAL Brokers”), includes buying and selling securities for retail customers on a, making recommendations with respect to asset allocation. For retail customers of SAL and for employees of SAL and its affiliates, SAL generally acts as broker in connection with the purchase and sale of securities.

Generally, SAL’s asset allocation recommendations are based on the best interest of the customer while minimizing potential conflicts.

As a general matter, other than new issue/secondary fixed income and new issue equities, SAL and SAL Brokers will not make recommendations with respect to any specific securities. SAL and SAL Brokers also generally act as broker in connection with the purchase and sale of securities for its customers.

Overview of this Reg BI Statement

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

For additional information regarding SAL and its brokerage services, or your brokerage account (“Brokerage Account”), please see the Form CRS for SAL at www.supremealliancecellc.com and SAL’s Conflict Disclosures at the same location. You can also request this information from your SAL Broker.

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

Material Facts About Our Relationship With You - Capacity

Any recommendations regarding your Brokerage Account are made in a broker-dealer capacity. In addition, any recommendations made by SAL and SAL Brokers to you regarding allocations to your brokerage accounts are generally made in a broker-dealer capacity.

SAL has no discretionary authority over your Brokerage Account and can only purchase or sell securities or execute investment strategies that you authorize. This means that you, the customer, make the ultimate decision regarding the purchase or sale of securities or other investments or

the allocation of assets recommended by us. Accordingly, you, the customer, must approve each transaction prior to execution.

Material Facts About SAL's Relationship With You

Material Fees and Costs

The following describes the material fees and costs that apply to recommendations made by SAL to you:

Retail customers generally enter into account agreements whereby brokerage services are securities are offered directly by the carrier or mutual fund company. Commissions paid to SAL are charged on a transaction basis. A full listing of Material Fees may be found at www.supremealliancellc.com.

Purchases and sales of securities pursuant to customer-directed transactions are not subject to Reg BI but are subject to various commissions and fees that are negotiated with customers.

Type and Scope of Services

Generally, other than buy and sell transactions, SAL brokerage accounts are only available to employees and to retail customers.

SAL does not provide any on-going or periodic review, follow-up or monitoring. In connection with asset recommendations, SAL will confirm the retail customer's investment objectives on at least an annual basis but does not provide any ongoing monitoring of a retail customer's accounts or investments.

SAL does act in the capacity of an investment adviser in certain instances. In such cases, the retail customer is charged either a flat fee or a percentage of assets under management.

Retail customers can engage in self-directed transactions in securities. Your purchases and sales of securities that are not recommended by us are not subject to Reg BI and can cause your account to perform in a way that is inconsistent with our recommendations.

SAL does not act with discretion over customers' accounts assets in its capacity as a broker dealer; the retail customer makes the decision regarding any purchase or sale of securities or any asset allocation recommended by SAL.

Material Limitations

SAL's recommendations regarding securities are generally limited to mutual funds and variable annuities.

SAL only recommends Mutual Funds to retail customers who are eligible to invest in those funds (whether foreign or domestic).

General Basis for Recommendations

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

Material Risks Associated with Brokerage Recommendations

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

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

Retail customers should consult the offering documents for any security that we recommend, including those for Mutual Funds, for a discussion of risks associated with the particular fund. If you would like a copy of any Offering Document prior to purchasing shares of an Mutual Fund or interests in a Private Fund, you may obtain one by contacting your SAL Broker (or, for NB Mutual Funds, by calling 561-460-2870).

In addition to the investment-specific risks associated with investments and investment strategies involving securities, there are other potential risks associated with any relationship with financial intermediaries, such as SAL. For example, as the use of technology increases, SAL and may be more susceptible to operational or information security-related risks. A breach in cyber security refers to both intentional and unintentional events that may cause SAL to lose proprietary information or operational capacity or suffer data corruption. Cyber security breaches of SAL's third-party service providers or issuers in which customers and clients invest may also subject SAL to many of the same risks associated with direct cyber security breaches. Cyber security breaches can cause disruptions and affect business operations, potentially resulting in financial

losses, impediments to trading, the inability to transact business, destruction to equipment and systems, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement or other compensation costs or additional compliance costs.

Standard of Conduct under Regulation Best Interest

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

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

Material Facts Regarding Conflicts of Interest

The SEC defines a conflict of interest as “an interest that might incline a broker, dealer, or a natural person who is an associated person of a broker or dealer – consciously or unconsciously – to make a recommendation that is not disinterested.” Conflicts of interest that arise include SAL or its registered representatives, in their capacity as associated persons of SAL (“SAL Brokers”): (1) serving the interest of SAL or the Firm over that of a retail customer; (2) SAL and SAL Brokers serving the interest of one customer or group of customers over those of other customers; or (3) SAL Brokers serving their own interests over those of the Firm, SAL or its retail customers.

The following is a summary of material facts related to conflicts of interest associated with recommendations that exist with respect to SAL’s business and its retail customers. The Firm has adopted policies and procedures reasonably designed to comply with applicable law and reduce and manage many of the conflicts described below, but it cannot eliminate or mitigate all conflicts. Please see SAL’s Form CRS or contact your SAL Broker for additional information regarding SAL and its brokerage services.

In addition to the summary below, each retail customer should review carefully the offering documents and prospectuses associated with every purchase. Where a retail customer invests in a mutual fund, an exchange-traded fund (“ETF”), or a the retail customer should carefully review the fund’s summary prospectus, prospectus, statement of additional information, offering memorandum, or other offering document (the “Offering Documents”). The conflict disclosures provided below apply to retail customers. If you are not a retail customer and would like additional information regarding the services provided to you by SAL, please contact your SAL Broker.

For a detailed discussion of the material conflicts of interest associated with the recommendations provided by SAL and SAL Brokers, please see SAL’s Conflict Disclosures below:

Compensation of SAL Brokers

In general, most SAL Brokers are compensated based on the revenues generated by SAL and with respect to the customers they cover. The percentage of revenue received by an SAL Broker or the SAL Broker’s team varies based on a number of factors.

Conflicts:

Because SAL and most SAL Brokers are compensated based on the revenues generated by SAL and with respect to its retail customers, this creates an incentive for SAL and SAL Brokers to increase the amount of assets invested with SAL. To increase the amount of assets invested with SAL and SAL and SAL Brokers have an incentive to promote or recommend that retail customers or prospective retail customers invest more of their money with SAL, including by transferring assets from other managers to SAL to introduce and/or rolling over the assets from a customer’s workplace retirement plan (e.g., 401K plan) to an IRA introduced by SAL.

Commissions for Customer-Directed Transactions

Purchases and sales of customer-directed transactions generate commissions to SAL.

Conflict:

SAL and SAL Brokers have an incentive to encourage customer-directed transactions in order to generate more revenue for SAL (and more compensation for SAL Brokers).

Other Customers/Clients

SAL provides brokerage, advisory and other services to many customers/clients.

Conflicts:

In providing various services to customers/clients, SAL (and SAL Brokers) face conflicts of interest with respect to activities performed for, or opportunities recommended or provided to, certain customers/clients, on the one hand, and their other customers/clients on the other hand. For example, SAL and SAL Brokers generally have an incentive to dedicate more time and resources to certain customers such as customers that pay higher fees, larger institutional customers, or customers from whom they are seeking additional business (collectively, “Favored Customers”). For example, when recommending investment opportunities, especially those that are limited, SAL and SAL Brokers have an incentive to favor certain customers or groups of customers (e.g., Favored Customers).

It is possible that, from time to time, the strategy or product recommended to, or invested in on behalf of, one retail customer/client could create or involve conflicts with strategies or products recommended to another retail customer/client.

Errors

SAL has adopted policies and procedures for correcting errors. Errors can result from a variety of situations (e.g., miscommunication of information).SAL’s policies and procedures require that all errors affecting a customer account be resolved promptly and fairly upon discovery. Under certain circumstances, the policy provides that transactions can, where appropriate, be cancelled or modified prior to acceptance by the carrier or mutual fund company. The intent of the policy is, where the customer is in a worse financial position as a result of the error, to restore a

customer account to the appropriate financial position considering all relevant circumstances surrounding the error.

Conflict:

In situations where correcting a error would result in SAL bearing financial losses, SAL has an incentive to ignore or understate the trade error.

Vendor Selection

SAL utilizes various third-party service providers and vendors in connection with the provision of its investment services.

Conflict:

When hiring third party vendors to service customer accounts, SAL has an incentive to choose vendors at the lowest possible cost to SAL or vendors that provide other financial incentives (e.g., potentially referring customers/clients to SAL).

Material Non-Public Information

If SAL (and SAL Brokers) may obtain material non-public information (“MNPI”). In those cases, in accordance with SAL’s and SAL Advisory Affiliates’ procedures and applicable law, SAL and SAL Brokers are prohibited from making recommendations or otherwise using the MNPI until such time as the information is no longer deemed to be non-public or material.

Conflict:

If SAL (and SAL Brokers) acquire MNPI (whether intentionally or unintentionally), that would restrict the ability of SAL and SAL Brokers from making a recommendation based on or otherwise using the MNPI, even on behalf of retail customers.