SYM FINANCIAL ADVISORS

UNCOMMON RELATIONSHIPS. UNCOMMON RESULTS.

Part 2A of Form ADV: Firm Brochure

SYM Financial Corporation

dba SYM Financial Advisors

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Part 2A of Form ADV: *Firm Brochure*

10/30/2026

This brochure provides information about the qualifications and business practices of SYM Financial Corporation. If you have any questions about the contents of this brochure, please contact us at 800-888-7968 or info@sym.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.

SYM Financial Corporation is registered as an investment adviser with the SEC under the U.S. Investment Advisers Act of 1940, as amended (the "Advisers Act"). SEC registration does not imply a certain level of skill or training.

Additional information about SYM Financial Corporation is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This Brochure dated 10/30/2026 replaces our last annual amendment dated 3/30/2026. Since our last amendment, this Brochure has been amended as follows:

- **Item 4 – Advisory Business**: added language regarding the Private Fund.
- **Item 5 – Fees and Compensation**: added language regarding the Private Fund.
- **Item 6 – Performance-Based Fees and Side-By-Side Management**: added language regarding the Private Fund.
- **Item 7 – Types of Clients**: added the Private Fund.
- **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**: enhanced language related to Leverage Risk and added language regarding the Private Fund.
- **Item 10 – Other Financial Industry Activities and Affiliations**: added language regarding the Private Fund.
- **Item 12 – Brokerage Practices**: updated language regarding Trade Aggregation and Allocation.
- **Item 13 – Review of Accounts**: added language regarding the Private Fund.
- **Item 14 – Client Referrals and Other Compensation**: updated language regarding endorsements.
- **Item 15 – Custody**: added language regarding the Private Fund.
- **Item 17 – Voting Client Securities**: added language regarding the Private Fund.

You will receive a copy of this Brochure or a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may provide other ongoing disclosure information about material changes, as necessary. We will further provide you with a new Brochure, as needed at any time, based on changes or new information, without charge.

Any Questions: SYM's Chief Compliance Officer, Crystal Allen, MBA, remains available to address any questions regarding the above updates and additions, or any other question pertaining to this Part 2A Brochure.

Item 3 – Table of Contents

Page

Item 1 – Cover Page 1
Item 2 – Material Changes 2
Item 3 – Table of Contents 3
Item 4 – Advisory Business 4
Item 5 – Fees and Compensation 8
Item 6 – Performance-Based Fees and Side-By-Side Management 11
Item 7 – Types of Clients 12
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss 12
Item 9 – Disciplinary Information 21
Item 10 – Other Financial Industry Activities and Affiliations 21
Item 11 – Code of Ethics, Participation/Interest in Client Transactions, Personal Trading 24
Item 12 – Brokerage Practices 24
Item 13 – Review of Accounts 26
Item 14 – Client Referrals and Other Compensation 27
Item 15 – Custody 28
Item 16 – Investment Discretion 28
Item 17 – Voting Client Securities 29
Item 18 – Financial Information 29

Item 4 – Advisory Business

Firm Description

SYM Financial Corporation (hereinafter referred to as "SYM") is a registered investment adviser with its principal place of business located in Indiana. SYM began conducting business as a registered investment adviser in 1985. SYM is principally owned by its employees.

Types of Advisory Services Offered

SYM offers the following services, each of which is more fully described below:

- Wealth Management
- Financial Planning
- Financial Planning Projects
- Portfolio Management
- Qualified Plan Consulting
- Private Fund

Wealth Management

Our firm provides Wealth Management services which is the integration of discretionary Portfolio Management and Financial Planning. Please note**:** SYM believes that it is important for the client to address financial planning issues on an ongoing basis. SYM's advisory fee, as set forth at Item 5 below, will remain the same regardless of whether or not the client determines to address financial planning issues with SYM.

Financial Planning

Our firm provides Financial Planning services based on the individual needs of the client. Through detailed discussions, we help our clients develop goals and objectives based on the client's particular circumstances.

Financial planning can include a comprehensive or issue specific evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, questions, information and analysis are considered as they impact, and are impacted by, the entire financial and life situation of the client. If needed, clients purchasing this service can receive a report which provides the client with a detailed financial plan designed to assist the client in achieving his or her financial goals and objectives. Depending on the client needs, these services may include cash flow analysis, tax planning, social security planning, risk exposure review, education funding, retirement planning, charitable planning, special needs planning, estate planning, business planning, and life insurance and disability planning. These services may include other areas that are specific to the client.

We gather required information which may include the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with an attorney, accountant, and insurance agent. Implementation of financial plan recommendations is entirely at the client's discretion.

Financial Planning Projects

Our firm also provides Financial Planning services on a project basis.

Portfolio Management

Our firm provides advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs.

We manage these advisory accounts on a discretionary or non-discretionary basis. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Once the client's portfolio has been established, we review the portfolio on a regular basis, and if necessary, rebalance the portfolio as needed, based on the client's individual needs.

In certain situations, SYM offers an automated investment program (the "Program") through which clients are invested in a range of investment strategies SYM has constructed and manages, each consisting of a portfolio of exchange-traded funds and mutual funds and a cash allocation. The client's portfolio is held in a brokerage account opened by the client at Charles Schwab & Co., Inc. ("Schwab") or any other broker-dealer/custodian. SYM uses automated advisor platforms ("Automated Platforms"), offered independent investment advisors to operate the Program. SYM is solely responsible, and Schwab nor any other broker-dealer/custodian, is not responsible, for determining the appropriateness of the Program for the client, choosing a suitable investment strategy and portfolio for the client's investment needs and goals, and managing that portfolio on an ongoing basis. SYM has an agreement with the Automated Platforms, which consists of providing technology and related trading and account management services for the Program. The Automated Platforms enable SYM to make the Program available to clients online and includes a system that automates certain key parts of our investment process (the "System"). Based on information the client provides to us, we will recommend a portfolio via the System. The client may then indicate an interest in a portfolio that is one level less or more conservative or aggressive than the recommended portfolio, but we then make the final decision in helping the client select a portfolio based on all the information we have about the client. The System also includes an automated investment engine through which we manage the client's portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if SYM elects and determines it is appropriate for the client and he/she is eligible).

Clients must agree to accept electronic delivery of the Portfolio Management Agreement, disclosure documents, prospectuses, statements, and other materials. SYM makes portfolio managers available to discuss servicing matters with clients.

Qualified Plan Consulting

Our firm provides Qualified Plan Consulting services primarily to 401(k), 403(b), profit sharing and pension plans. Qualified Plan Consulting services are comprised of four distinct services, and we provide several advisory services separately or in combination. Clients may choose to use any or all of these services.

Investment Policy Statement Preparation (hereinafter referred to as "IPS"): We will meet with the client (in person or over the telephone) to determine an appropriate investment strategy that reflects the plan sponsor's stated investment objectives for management of the overall plan. Our firm then prepares a written IPS detailing those needs and goals, including an encompassing policy under which these goals are to be achieved. The IPS also lists the criteria for selection of investment vehicles as well as the procedures and timing intervals for monitoring of investment performance.

Selection of Investment Vehicles: We review and consider various mutual funds (both index and managed) to determine which investments are appropriate in order to implement the client's IPS. We then assist plan sponsors in constructing an investment lineup that includes asset allocation models, target date funds and individual mutual funds.

Monitoring of Investment Performance: We monitor client investments based on the procedures and timing intervals delineated in the IPS. Our firm creates and monitors the investment lineup for our plan sponsors. We also supervise the client's portfolio and will make recommendations to the client as market factors and the client's needs dictate.

Employee Communications: For qualified plan clients with individual plan participants exercising control over assets in their own account ("self-directed plans"), we may also provide educational support and investment workshops designed for the plan participants. The nature of the topics to be covered will be determined by us and the client under the guidelines established in ERISA Section 404(c). SYM may provide educational support and investment workshops that aid plan participants in the selection of appropriate investment options.

Private Fund

SYM serves as investment manager and provides management and advisory services to Ever True Capital Partners, LLC, a Delaware limited liability company and private pooled investment vehicle (the “Private Fund”). The Private Fund is designed with the intention to initially allocate all investable assets to the Apollo Aligned Alternatives (A), L.P., a Delaware limited partnership (the “Apollo Fund”), which is managed by affiliates of Apollo Global Management, Inc. (“Apollo”), to pursue the Private Fund’s objectives through a concentrated, purpose-built exposure. SYM selected the Apollo Fund based on its assessment of a number of factors, including the Apollo Fund’s investment strategy, fee structure, risk management practices, the track record of its manager, the diversification of its underlying exposures and the transparency of its portfolio. Those are SYM’s views, and there can be no assurance that the Apollo Fund will achieve its objectives or that investors will not lose some or all of their investment.

Interests in the Private Fund are offered and sold exclusively to investors who are “qualified purchasers” and who otherwise satisfy the eligibility and suitability requirements described in the Private Fund’s offering documents. Such offer or solicitation of interests is made pursuant to the subscription agreement and associated appendices for the Private Fund. Investments for the Private Fund are managed in accordance with the terms of their governing documents and are not tailored to the individualized needs of any particular investor in the Private

Fund (each an "Investor"). Information about the Private Fund can be found in its offering documents, including its confidential offering memorandum (the "Offering Memorandum"), which will be available to qualified current and prospective investors only through SYM or another authorized party.

Client Obligations

In performing our services, SYM shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, it remains each client's responsibility to promptly notify SYM if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising our previous recommendations and/or services.

Various services offered by SYM rely on the client providing requested information. The quality of these planning services may be adversely affected should the client not provide requested information, and SYM may not be able to complete some services should the client fail to provide requested information. In such cases, SYM will complete planning services to which we have contractually agreed to the extent possible; SYM will not be obligated to refund any portion of planning fees should we not be able to complete all the agreed upon services due to a client's failure to provide requested information.

Client acknowledges SYM does not provide legal advice, nor does it serve as an accountant or insurance agency, and no portion of our services should be construed as such. Therefore, SYM does not prepare estate planning documents, tax returns or sell insurance products. To the extent requested by a client, we may recommend the services of other professionals for these types of services. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion to determine which professional to engage with respect to these matters. Please note: At all times, the engaged unaffiliated licensed professional[s] (i.e., attorney, accountant, insurance agent, etc.), and not SYM, shall be responsible for the quality and competency of the services provided by such professional.

Miscellaneous

Retirement Rollovers-Potential for Conflict of Interest: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If SYM recommends that a client roll over their retirement plan assets into an account to be managed by SYM, such a recommendation creates a conflict of interest if SYM will earn new (or increase its current) compensation as a result of the rollover. When acting in such capacity, SYM serves as a fiduciary under the Employee Retirement Income Security Act (ERISA), or the Internal Revenue Code, or both. No client is under any obligation to roll over retirement plan assets to an account managed by SYM. Any questions: SYM's Chief Compliance Officer, Crystal Allen, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.

Use of Mutual and Exchange Traded Funds: Some mutual funds and exchange traded funds are available directly to the public. Thus, a prospective client can obtain some of the funds that may be utilized by SYM independent of engaging SYM as an investment advisor. However, if a prospective client determines to do so, he/she will not receive SYM's initial and ongoing Portfolio Management services. Please note: In addition to SYM's Portfolio

Management fee described below, and transaction and/or custodial fees charged by the account custodian, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g., management fees and other fund expenses).

Use of DFA Mutual Funds: SYM utilizes the mutual funds issued by Dimensional Fund Advisors ("DFA"). DFA funds are generally only available through registered investment advisers approved by DFA. Thus, if the client were to terminate SYM's services, and transition to another adviser who has not been approved by DFA to utilize DFA funds, restrictions regarding additional purchases of, or reallocation among other DFA funds, will generally apply. Any questions: SYM's Chief Compliance Officer, Crystal Allen, remains available to address any questions that a client or prospective client may have regarding mutual and exchange traded funds, including DFA funds.

Portfolio Activity: SYM has a fiduciary duty to provide services consistent with the client's best interest. As part of its Portfolio Management services, SYM will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, market conditions, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when SYM determines that changes to a client's portfolio are neither necessary, nor prudent. Clients remain subject to the fees described in Item 5 below during periods of account inactivity. As indicated below, there can be no assurance that investment decisions made by SYM will be profitable or equal any specific performance level(s).

Non-Discretionary Service Limitations: Clients that determine to engage SYM on a non-discretionary investment advisory basis must be willing to accept that SYM cannot effect any account transactions without obtaining prior consent to any such transaction(s) from the client. Thus, in the event that SYM would like to make a transaction for a client's account, and the client is unavailable, SYM will be unable to effect the account transaction (as it would for its discretionary clients) without first obtaining the client's consent.

Investment Risk: Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by SYM) will be profitable or equal any specific performance level(s).

Assets under Management

As of 12/31/2025, we were actively managing $5,813,231,190 of which $5,138,201,003 of clients' assets were managed on a discretionary basis and $675,030,187 of clients' assets were managed on a non-discretionary basis.

Item 5 – Fees and Compensation

SYM charges its fee on a percentage of client assets under management or may charge flat fees.

Advisory fees are billed quarterly, in advance (with the exception of Qualified Plan Consulting services), based upon the market value (including cash, securities, and accrued income) of the assets on the last business day of the previous quarter (adjusted for intra-quarter additions/withdrawals, as applicable). Qualified Plan Consulting services are billed in arrears at the beginning of each calendar quarter. Advisory fees are debited directly from client accounts unless the client made alternative arrangements.

Client agreements will continue in effect until terminated by either party by written notice to the other. Upon termination, SYM will have no obligation to recommend or take any action with regard to securities, cash or other investments and will refund a pro rata portion of any prepaid and unearned advisory fees.

No change from the agreed upon annual fee shall be effective without prior written notification to the client. Unless SYM determines to the contrary, advisory fees shall commence upon execution of the advisory agreement by the client and SYM.

Fees for each service are explained below in more detail.

Wealth Management

Our annual fees for Wealth Management services are calculated as a percentage (%) of the market value of the assets under management. Those percentages are tiered based on assets under management and generally range from .30 – 1.50% as set forth in the fee schedule in the client's advisory agreement. There is a minimum annual fee commensurate with client complexity and is generally no less than $2,500 for clients with emerging wealth.

Financial Planning Projects

Our Financial Planning Project fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client. The agreed upon fee, which is stated in the respective client's contract, is payable as follows: 50% of the fee is due at the start of the Financial Planning Project, up to $1,200, and the remaining 50% is due at the completion of the Financial Planning Project. Any advance payment of Financial Planning Project fees will not exceed $1,200 for work that will not be completed within six months.

Portfolio Management

Our annual fees for Portfolio Management are calculated as a percentage (%) of the market value of the assets under management. That percentage is generally less than or equal to 1.25% as set forth in the fee schedule in the client's advisory agreement.

Qualified Plan Consulting

Our annual fees for Qualified Plan Consulting services are calculated as a percentage (%) of the market value of the assets under management. Those percentages are tiered based on assets under management and generally range from .20 – .70%. There is a minimum annual fee and it is generally no less than $4,000.

Private Fund

SYM receives a Management Fee equal to 3% per annum of each investor's capital account balance in the Private Fund, calculated and accrued monthly based on the balance of such capital account as of the beginning of the month. Our Management Fee rate is higher than typically charged by advisers to comparable "single-manager access" or "feeder" funds. This higher fee structure creates an incentive for SYM to form and manage the Private Fund notwithstanding the availability of lower-cost alternatives, including direct investment by Investors in the Apollo Fund (if such access were available to investors) or other pooled investment vehicles. A portion of the Management Fee will be used for the Purdue Athletics related expenditures described in Item 10.

Investors will bear a layering of fees and expenses, including (i) the Management Fee payable to SYM and (ii) management fees, carried interest and expenses charged to the Private Fund at the level of the Apollo Fund.

SYM may waive the Management Fee payable by one or more Investors, including the Investment Manager, its principals, partners, members, employees and other Affiliates (collectively, "Affiliated Investors") and certain other Investors with whom the Investment Manager has a commercial or other relationship. The Investment Manager is under no obligation to offer any such Management Fee waiver to any investor, and investors should not expect to receive the benefit of any terms granted to other Investors.

Under the Private Fund's LLC Agreement, Capital Integration Systems LLC ("CAIS"), the sponsor and managing member of the Private Fund, is entitled to receive a technology fee equal to 0.20% per annum of the Net Asset Value of each Investor's interest in the Private Fund, subject to an annual minimum of [$62,500] (the "Technology Fee"). For so long as the Private Fund remains invested in the Apollo Fund, the general partner of the Apollo Fund (or its affiliate) pays CAIS a fee of the same amount under a separate agreement between CAIS and Apollo, and CAIS waives the Technology Fee that the Private Fund would otherwise pay. As a result, Investors do not bear the Technology Fee while that arrangement is in effect. SYM is not a party to that agreement and does not receive any portion of those payments. If the arrangement terminates, including automatically if the Private Fund withdraws entirely from the Apollo Fund, the Technology Fee would become payable by the Private Fund and would be borne by Investors. When payable, the Technology Fee is determined and paid at the end of each fiscal quarter in arrears and upon any Investor's complete withdrawal from the Private Fund and is prorated for any partial periods.

Mutual Fund Fees

All fees paid to SYM for Portfolio Management services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the mutual fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the mutual funds and our fees, to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Alternative Investment Fees

For certain clients, SYM assists with identifying alternative investments to help implement the client's objectives on a non-discretionary consulting basis. SYM also provides discretionary advice with respect to alternative investments for clients who fit the suitability profile for these types of investments. These investments may include; but, are not limited to private equity funds, private debt funds, real estate funds, and hedge funds.

If a client determines to become a private fund investor, and/or SYM recommends alternative investments to a client, the amount of assets invested in the fund(s) shall be included as part of "assets under management" for purposes of SYM calculating its Portfolio Management fee per Item 5. No SYM client is under absolutely any obligation to consider or make an investment in a private investment fund(s).

Please note: Private investment funds generally involve various risk factors, including, but not limited to, potential for complete loss of principal, liquidity constraints and lack of transparency, a complete discussion of which is set forth in each fund's offering documents, which will be provided to each client for review and consideration. Unlike

liquid investments that a client may own, private investment funds typically do not provide daily liquidity or pricing. Each prospective client investor may be required to complete a Subscription Agreement, pursuant to which the client shall establish that he/she is qualified for investment in the fund; and acknowledges and accepts the various risk factors that are associated with such an investment.

Additional Fees and Expenses

In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transaction for the client's account(s). Please refer to the Brokerage Practices section in Item 12 of this Form ADV for additional information.

ERISA Accounts

SYM is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include, among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, SYM may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees. Conversely, SYM may charge fees for investment advice about products required to be included on the plan platform by plan sponsors that pay 12b-1 fees to offset plan expenses; however, SYM does not receive any portion of such 12b-1 fees.

Fee Modifications/Dispersion

SYM, in its sole discretion, may charge a lesser advisory fee, waive or modify its asset minimum or its annual minimum fee, charge a flat fee, a higher fee, or waive its fee entirely based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, complexity of the engagement, grandfathered fee schedules, SYM employees and family members, courtesy accounts, etc.). Please note: As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. Please also note: In the event that the client is subject to the annual minimum fee, the client will generally pay a higher fee for SYM's services. Any questions: SYM's Chief Compliance Officer, Crystal Allen, remains available to address any questions that a client or prospective client may have regarding advisory fees.

Item 6 – Performance-Based Fees and Side-By-Side Management

SYM does not receive performance-based fees or carried interest from the Private Fund or from Investors in the Private Fund. SYM's only compensation from the Private Fund is the Management Fee described in Item 5. The Apollo Fund and any other fund in which the Private Fund invests (each, an "Underlying Fund") charge their own management fees and may charge performance-based fees or "carried interest" to their investors, including the Private Fund. Those amounts are borne indirectly by Investors, are not paid to SYM and will reduce the returns of the Private Fund. [Under the Apollo Fund's limited partnership agreement, Class B units bear management fees at an aggregate annualized effective rate of approximately 1.30% and Class C units at approximately 1.50%, in

each case taking into account management fees borne in respect of the Apollo Fund's underlying investments, and carried interest may also be charged under the governing documents of those underlying investments.]

In addition, Investors will not have the ability to review the terms of such fees, expenses and performance-based fees or "carried interest" for any Underlying Fund prior to subscribing. Investors will directly bear fees and expenses relating to the Private Fund and will, indirectly, bear fees and expenses borne by the Private Fund as an investor in the Underlying Funds, potentially including asset-based fees, performance-based fees or "carried interest" and other fees and operating expenses. In addition, to the extent that an Underlying Fund is a "fund of funds," the Private Fund may bear an additional layer of fees.

SYM has adopted aggregation and allocation of investments procedures designed to ensure that all clients are treated fairly and equally and to address conflicts of interest that may arise because SYM manages the Private Fund, which pays a higher fee, alongside its other clients, including conflicts in recommending the Private Fund to clients (see Item 10). SYM does not charge performance-based fees or participate in side-by-side management for Wealth Management services or for the Private Fund. The strategies for the Private Fund are different than the strategies for Managed Accounts that are traded by SYM.

Item 7 – Types of Clients

SYM provides advisory services to the following types of clients:

- Individuals, including High Net Worth Individuals
- Qualified Retirement plans (other than plan participants) including pension and profit-sharing plans, trusts, and estates
- Charitable organizations
- Corporations or other businesses not listed above
- Private Fund

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis and Investment Strategies

When creating portfolios, we utilize top-down asset allocation strategies to diversify clients' investments. We seek to select the most suitable fund managers to utilize in our portfolios, and our Investment Committee meets regularly to analyze economic data, market analysis and manager performance. When market opportunities are apparent, we may make tactical asset allocation shifts. SYM uses the following methods of analysis in formulating our investment advice and/or managing client assets:

Fundamental Analysis

We attempt to measure the intrinsic value of a security or groups of securities by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management

of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market, regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis

We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company or groups of companies. This presents a risk in that a poorly managed or financially unsound company may underperform regardless of market movement.

Risks for All Forms of Analysis

Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Other

SYM also utilizes a philosophy of Top-Down Tactical Asset Allocation. "Top Down" means analyzing market conditions and selecting investments that we believe will do well in those conditions.

Based on this data, our understanding of your own financial goals and tolerance for risk, and the ideal location of your assets (i.e., in taxed vs. tax deferred accounts), SYM seeks to create a customized portfolio using a combination of global bonds, equity funds, and alternatives. We work with our clients to determine that the strategy(ies) is appropriate to their needs and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations. Portfolios may be invested in one of our Model Strategies which we use to manage an equities-only portfolio and various blended portfolios which are constructed using both equity and fixed income funds. SYM can also manage custom portfolios based on a client's Investment Policy Statement in certain circumstances. Alternative strategies may employ investments in private investment vehicles, liquid alternatives or derivatives.

Long-term Purchases

We purchase securities with the idea of holding them in the client's account for a year or longer. Typically, we employ this strategy when:

- We believe the securities to be currently undervalued, and/or
- We want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Short-term Purchases

When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). These investments are typically to fund an approaching liability. In other instances, we may also make short-term purchases in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase, or to avoid undesirable characteristics in other parts of the market.

A short-term purchase strategy poses risks, should the anticipated price swing not materialize; we are then left with the option of having a long-term investment in a security that was designed to be a short-term purchase, or potentially taking a loss.

In addition, this strategy may involve more frequent trading than does a longer-term strategy, and could result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

Short Sales

When utilizing this strategy, we borrow shares of a stock for your portfolio from someone who owns the stock on a promise to replace the shares on a future date at a certain price. Those borrowed shares are then sold. On the agreed-upon future date, we buy the same stock and return the shares to the original owner. We engage in short selling based on our determination that the stock will go down in price after we have borrowed the shares. If we are correct and the stock price has gone down since the shares were purchased from the original owner, the client account realizes the profit.

Margin Transactions

SYM does not generally recommend margin for investment purposes; however, for certain clients, we may, when exchanging an ETF for a similar mutual fund, purchase those securities for your portfolio on a short-term basis with money borrowed from your brokerage account. This allows you to purchase more securities than you would be able to with your available cash, and allows us to purchase securities without selling other holdings.

A *margin account* is a brokerage account that allows investors to borrow money to buy securities. By using borrowed funds, the customer is employing leverage that will magnify both account gains and losses. The broker charges the investor interest for the right to borrow money and uses the securities as collateral. Any questions: SYM's Chief Compliance Officer, Crystal Allen, remains available to discuss any questions that a client has regarding the use of margin.

Option Transactions

We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.

The two types of options are calls and puts:

- A call gives us the right to buy an asset at a certain price within a specific period of time. We may buy a call if we have determined that the stock will increase substantially before the option expires.

- A put gives us the holder the right to sell an asset at a certain price within a specific period of time. We may buy a put if we have determined that the price of the stock will fall before the option expires.

We may use options to speculate on the possibility of a price swing. We may also use options to "hedge" a purchase of the underlying security; in other words, we may use an option purchase to limit the potential upside and downside of a security we have purchased for your portfolio.

We may use "covered calls", in which we sell an option on a security you own. In this strategy, you receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price.

We may use a "spreading strategy", in which we purchase two or more option contracts (for example, a call option that you buy and a call option that you sell) for the same underlying security. This effectively puts you on both sides of the market, but with the ability to vary price, time and other factors.

Covered Call Writing

Upon client request, SYM may assist a client with covered call writing. Covered call writing is the sale of in-, at-, or out-of-the-money call options against a long security position held in a client portfolio. This type of transaction is intended to generate income. It also serves to create downside protection in the event the security position declines in value. Income is received from the proceeds of the option sale. Such income may be reduced to the extent it is necessary to buy back the option position before its expiration. This strategy may involve a degree of trading velocity, transaction costs and significant losses if the underlying security has volatile price movement. There can be no assurance that the security will not be called away by the option buyer, which will result in the client (option writer) to lose ownership in the security and incur potential unintended tax consequences. Any questions: SYM's Chief Compliance Officer, Crystal Allen, remains available to address any questions that a client or prospective client may have regarding options strategies.

Put Writing

Upon client request, SYM may assist a client with put writing. Put writing is the sale of in-, at-, or out-of-the-money put options against an investment index or an underlying investment itself. This type of transaction is intended to generate income. The strategy earns income by assuming the risk of rapid market declines that hedgers want to protect them from. Income is received from the proceeds of the option sale. Such income may be reduced in the event of rapid market declines or to the extent it is necessary to buy back the option position before its expiration. This strategy may involve a degree of trading velocity, transaction costs and significant losses if the underlying security has volatile price movement. There can be no assurance that the put option buyer will not sell the underlying security to the put writer by exercising the option, which may result in the client (option writer) gaining ownership in the security and potentially incurring margin interest or unintended tax consequences. Any questions: SYM's Chief Compliance Officer, Crystal Allen, remains available to address any questions that a client or prospective client may have regarding options strategies.

Material Risks of Investment Strategies

There can be no guarantee of success of the strategies offered by SYM. These strategies may employ limitations on particular sectors, industries, countries, regions or securities and are subject to certain risks as outlined below.

Market Risk

The profitability of a significant portion of SYM's recommendations may depend on stocks and bonds appreciating in value over a 7- to 10-year horizon. There is the possibility that the value of securities may decline due to daily fluctuations in the securities markets.

Security prices vary daily as a result of many factors, including developments that affect the condition of an individual company and the market in general. In addition, investment portfolios may be affected by other economic conditions such as changes in interest rates, foreign currency fluctuations, availability of credit, inflation rates, changes in laws, and national and international political circumstances. In particular, the price of many securities assumes favorable tax treatment (e.g., taxes on dividends and capital gains or certain tax-exempt municipal bond interest payments). The continued tax-favored treatment of certain securities cannot be guaranteed, and the suspension or limitation of tax advantages could have a material, negative impact on the market price of a security.

Management through Similarly Managed "Model Strategy" Accounts

SYM manages certain accounts through the use of similarly managed "model" portfolios, whereby the firm allocates all or a portion of its clients' assets among various mutual funds and/or securities on a discretionary basis using one of its proprietary investment strategies.

The model strategy used to manage a model portfolio may involve portfolio turnover that could negatively impact clients' net after-tax gains. While the firm seeks to ensure that clients' assets are managed in a manner consistent with their individual financial situations and investment objectives, securities transactions effected pursuant to a model investment strategy may have individual tax ramifications for certain clients.

Use of Independent Managers

SYM may recommend the use of an independent, unaffiliated investment manager to manage a portion, or all, of a client's portfolio. In these situations, SYM continues to conduct ongoing due diligence of such managers, but such recommendations rely to a great extent on the independent managers' ability to successfully implement their investment strategies. In addition, SYM generally may not have the ability to supervise the independent managers on a day-to-day basis. Please note: The investment management fee charged by the Independent Manager(s) is separate from, and in addition to, SYM's Portfolio Management advisory fee referenced in Item 5. Any questions: SYM's Chief Compliance Officer, Crystal Allen, remains available to address any questions that a client or prospective client may have regarding the allocation of account assets to an Independent Manager(s), including the specific additional fee to be charged by such Independent Manager(s).

Accuracy of Public Information

SYM may rely, in part, on the basis of information and data filed by issuers with various government regulators, information made directly available to the Advisor by the issuers, or information accessed through available sources other than the issuers. Although SYM evaluates all such information and data, and typically seeks independent corroboration when SYM considers information to be appropriate and reasonably available, SYM is not in a position to guarantee the completeness, genuineness or accuracy of such information and data.

Liquidity Risk

The risk of being unable to buy or sell assets in a given size over a given period without adversely affecting the price of the asset.

Short Sale Risk

A short sale involves the sale of a security that the client account does not own in the expectation of purchasing the same security (or a security exchangeable for such security) at a later date at a lower price. To make delivery to the buyer, the account must borrow the security, and is obliged to return the security to the lender, which is accomplished by a later purchase of the security. A profit or a loss results from a short sale if the price of the security decreases or increases, respectively, between the date of the short sale and the date on which the short position is covered, i.e., the security to replace the borrowed security is purchased. A short sale involves the theoretically unlimited risk of an increase in the market price of the security that would result in a theoretically unlimited loss.

Margin Risk

If a client account uses margin to purchase securities, this means that the account holder is obtaining a loan from the brokerage firm where the account is held and using the money from the loan to invest in more securities than you can buy with your available cash. If the securities decline in value, the account holder must repay the loan resulting in amplified losses.

Options Trading Risk

These risks include, but are not limited to, volatile movements in the price of the underlying instrument and misjudgments as to the future prices of the options and/or the underlying instrument. Increased option volatility can increase both the profit potential and the risk of trading. While volatility can be monitored and reacted to, there is no cost-effective means of hedging against market volatility. Selling options creates additional risks. In exchange for the proceeds received from selling a covered call option, the option seller risks not participating in all of the underlying stock's potential gain. In exchange for the proceeds received from selling a put option, the option writer risks being forced to purchase an underlying investment at a price that exceeds the investment's prevailing market price.

Margin or Line of Credit Risk

The use of borrowing (i.e., leverage) exposes a client to additional levels of risk including greater losses from investments than would otherwise have been the case without borrowing on margin or through a line of credit.

Fluctuations in the amount of a client's borrowings and the corresponding interest rates may have a significant effect on the profitability and stability of a client's portfolio and the portfolio would be exposed to increased volatility. A relatively small market movement may result in substantial losses when leverage is employed. In addition, leveraged positions may require the posting of collateral or margin, and adverse market movements may result in margin calls or the forced liquidation of positions at unfavorable prices or result in tax consequences. The use of derivatives to obtain leveraged exposure also introduces additional risks, including counterparty risk, liquidity risk, and valuation risk. While leverage may enhance returns in certain market conditions, there can be

no assurance that such a strategy will be successful, and the use of leverage may adversely impact investment performance.

Material Risks of Securities

One of the main risks in using fundamental analysis is that while the overall strength and competitiveness of a company may be good, market conditions may negatively impact the security. Investing in securities involves the risk of loss. Clients should be prepared to bear potential loss.

SYM primarily utilizes open-ended funds (such as mutual funds or exchange-traded funds) whose portfolios are invested in equity and fixed income securities.

Mutual Funds and Exchange-Traded Funds ("ETFs")

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs may distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per-share-NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

SYM may utilize leveraged and inverse ETFs and ETNs whose returns are based on a positive or negative multiple of the performance of the underlying index. Leveraged and inverse ETFs and ETNs pursue a range of investment strategies through the use of swaps, futures contracts, and other derivative instruments, which also carry high levels of risk. The principal risks associated with investing in leveraged and inverse ETFs and ETNs include compounding risk, derivative securities risk, correlation risk and short sale exposure risk.

Risks Related to Equity Investments

Regardless of any one company's particular prospects, a declining stock market may produce a decline in prices for all equity securities, which could also result in losses.

In addition to common stocks, the equity securities in a portfolio may include preferred stocks, convertible preferred stocks, convertible bonds, and warrants. Like common stocks, the value of these equity securities may fluctuate in response to many factors, including the activities of the issuer, general market and economic

conditions, interest rates, and specific industry changes. Convertible securities entitle the holder to receive interest payments or a dividend preference until the security matures, is redeemed, or the conversion feature is exercised. As a result of the conversion feature, the interest rate or dividend preference is generally less than if the securities were non-convertible. Warrants entitle the holder to purchase equity securities at specific prices for a certain period of time. The prices do not necessarily move parallel to the prices of the underlying securities and the warrants have no voting rights, receive no dividends, and have no rights with respect to the assets of the issuer.

Competition

Equity securities selected by SYM for its portfolios typically have significant market competitors and there is no guarantee that a portfolio security will perform better than its competitors and could be subject to risks competing with other companies with regard to product lines, technology advancements and/or management styles of the competing companies.

Risks related to Fixed Income Securities

Fixed Income securities are subject to the risk of an issuer's ability to meet principal and interest payments on the obligation (credit risk) and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity (market risk). The market values of fixed income securities tend to vary inversely with the level of interest rates. When economic conditions appear to be deteriorating, medium to lower rated securities may decline in value due to heightened concern over credit quality, regardless of prevailing interest rates.

Credit Risk

Credit risk is the risk that the issuer or guarantor of a debt security or counterparty to the portfolio's transactions will be unable or unwilling to make timely principal and/or interest payments, or otherwise will be unable or unwilling to honor its financial obligations. If the issuer, guarantor, or counterparty fails to pay interest, the portfolio's income may be reduced. If the issuer, guarantor, or counterparty fails to repay principal, the value of that security and value of portfolio may be reduced.

Interest Rate Risk

Interest rate risk is the possibility that bond prices overall will decline over short or long periods because of rising interest rates.

Municipal Securities

Investments may be made in municipal securities. Municipal securities consist of debt obligations issued by state and local governments, or by public authorities, to obtain funds to be used for various public facilities, for refunding outstanding obligations, for general operating expenses and for lending such funds to other public institutions and facilities. These funds may also be used for certain private activity and industrial development bonds issued by, or on behalf of, public authorities to obtain funds for the construction, equipment, repair or improvement of privately-operated facilities. General debt obligation bonds are backed by the taxing power of the issuing municipality. Revenue obligations are backed by the revenue of a project or facility, for example, tolls from a toll bridge. Certificates of participation represent an interest in an underlying obligation or commitment such as an obligation issued in connection with a leasing arrangement. The payment of principal and interest on

private activity and industrial development obligations generally depends solely on the revenues generated by the use of the specified facilities. Some municipal bonds may be insured by commercial insurance policies which are meant to pay principal and interest payments to bondholders in the event that the issuer defaults. However, the insurance is not a guarantee against loss and depends upon the creditworthiness of both the insurer and the issuer. Prices and yields on municipal bonds are dependent on a variety of factors, such as the financial condition of the issuer, general conditions of the municipal bond market, the size of a particular offering, the maturity of the obligation, and the rating of the issue.

Rating Agencies

Ratings assigned by Moody's and/or S&P and/or Fitch to securities acquired in a portfolio reflect only the views of those agencies. Explanations of the significance of ratings should be obtained from Moody's, S&P and Fitch. No assurance can be given that ratings assigned will not be withdrawn or revised downward if, in the view of Moody's, S&P or Fitch, circumstances so warrant.

Risks related to Private Investment Vehicles

Use of Private Alternative Investment Vehicles and Alternative Investments

SYM recommends that certain clients invest in privately placed alternative investment vehicles (e.g., hedge funds, private equity funds, etc.). SYM does not directly manage these vehicles (other than the Private Fund, which SYM manages as described in Item 4, although the Private Fund invests in an underlying fund that SYM does not manage); these investment vehicles retain their own managers who make the investment decisions and underlying security selections for the vehicle. The managers of these vehicles have broad discretion in selecting the investments. Typically, there are few limitations on the types of securities or other financial instruments which may be traded or used, and no requirement to diversify. Some types of these investment vehicles may trade on margin or otherwise leverage positions, thereby potentially increasing the risk to the vehicle. In addition, because private investment vehicles are not registered investment companies, they are not subject to the same regulatory reporting and oversight of a registered entity. There are numerous risks in investing in these types of securities. Clients should consult each investment's private placement memorandum and/or other prospectus or documents explaining such risks prior to investing.

Alternative investments, such as hedge funds and private equity/venture capital funds, including through special purpose vehicles, are speculative and involve a high degree of risk. There is no secondary market for alternative investments and there may be significant restrictions or limitations on withdrawing from or transferring these types of investments. Private equity funds generally require an investor to make and fund a commitment over several years. Alternative investments generally have higher fees (including both management and performance-based fees) and expenses that offset returns. Alternative investments are generally subject to less regulation than publicly traded investments.

Risks Related to the Private Fund

Concentration and Reliance on the Apollo Fund. The Private Fund is designed to invest all or substantially all of its assets in a single underlying fund, the Apollo Fund, and is therefore not diversified. Investors will be exposed to the performance of the Apollo Fund and to the decisions of its manager, which SYM does not control. The Apollo Fund may invest in a wide range of private equity, credit, real asset and other alternative investments,

including investments in funds managed by affiliates of Apollo and by third parties, may borrow money and may hold illiquid assets. SYM relies on Apollo for information about the Apollo Fund and has limited ability to verify it.

Layered Fees and Expenses. Investors bear SYM's Management Fee in addition to the fees, carried interest and expenses of the Apollo Fund and its underlying investments, which are described in Items 5 and 6, and the Private Fund's own expenses, which are not subject to any cap. These costs will reduce returns, and an Investor could lose money even if the Apollo Fund generates positive returns.

Reliance on CAIS and Other Service Providers. Because the Private Fund invests in Apollo Fund, it relies on CAIS as its sponsor and managing member, and on its administrator and other service providers for subscriptions, accounting, tax reporting and regulatory filings, and SYM does not control them. If SYM's investment management agreement terminates, the Private Fund may be liquidated or its assets may be transferred, and a liquidation could be delayed by the Apollo Fund's withdrawal restrictions.

Item 9 – Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. Our firm and our management personnel have no reportable disciplinary events to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

Registered Representatives and Other Registrations

Neither SYM nor any management persons are registered or have a pending registration with or as a broker/dealer, nor does SYM or any management persons have an application to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Material Relationships or Arrangements

SYM has a minority ownership interest in a savings and loan holding company, National Advisors Holdings, Inc. (NAH) that formed a federally chartered trust company, "National Advisors Trust Company" (NATC). NAH and NATC are regulated by the Office of Thrift Supervision. The trust company intends to provide an alternative to traditional trust service providers, and SYM intends to refer clients to NATC for trust services, where appropriate.

Clients should be aware that the receipt of additional compensation by SYM and its management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. SYM endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address conflict:

- We disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation from client referrals to SYM;
- We disclose to clients that they are not obligated to purchase recommended investment products from our employees or affiliated companies;

- We collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance; and
- We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

Where appropriate, SYM may recommend the various investment and investment-related services of the related companies to our advisory clients. The related companies and their employees may also recommend the advisory services of our firm to their clients. The services provided by the related companies are separate and distinct from our advisory services; and are provided for separate and additional compensation. No SYM client is obligated to use the services of any of the related companies.

Private Fund

SYM provides investment management services to the Private Fund under an investment management agreement (the "IMA") with the Private Fund and CAIS, subject to the supervision and control of CAIS, as managing member, and the Private Fund's governing documents. SYM does not manage the Apollo Fund. As discussed in Item 4 and Item 5 above, SYM may recommend, where appropriate, that certain Managed Account assets be invested in the Private Fund. To the extent that SYM recommends that a client invests a portion of its assets in the Private Fund, SYM will not charge the annual Wealth Management fee in respect of such assets. The Client would only pay the fees for the Private Fund. However, a conflict of interest exists as SYM's compensation may be higher when Managed Account assets are invested in the Private Fund. For example, the Management Fee for the Private Fund is 3% per annum, compared with Wealth Management fees that generally do not exceed 1.50%, and the Private Fund also bears the fees and expenses described in Item 5. SYM only recommends that a client invest its assets in the Private Fund when the investment is in line with the Client's overall investment objectives.

Relationships with CAIS and Apollo. CAIS retains responsibility for the Private Fund's subscriptions, investor onboarding, tax withholding and certain regulatory filings. SYM is not affiliated with CAIS or Apollo and does not control either of them, and SYM does not receive any compensation or other benefit from CAIS or Apollo in connection with the Private Fund, including the payments by Apollo to CAIS described in Item 5. Because those payments, and the resulting waiver of the Technology Fee, and if the Private Fund withdraws entirely from the Apollo Fund, SYM may have an incentive to keep the Private Fund invested in the Apollo Fund, and to maintain its relationships with CAIS and Apollo, rather than reallocate to another manager that may be more appropriate for Investors. As noted in Item 5 (and 8) the fee waiver benefits investors who would normally bear their share of the fee.

This higher fee structure is designed to enable SYM to make payments described below related to Purdue University ("Purdue") and Purdue University Athletics ("Purdue Athletics") and creates an incentive for SYM to form and manage the Private Fund notwithstanding the availability of lower-cost alternatives, including direct investment by investors in the Apollo Fund (if such access were available to investors) or other pooled vehicles.

Purdue Athletics Marketing and Associated Conflicts

SYM has an informal understanding with representatives of Purdue Athletics under which SYM will use a substantial portion of the Management Fees it receives from the Private Fund for marketing expenditures, corporate sponsorships and donations benefiting programs affiliated with Purdue, Purdue Athletics and, potentially, individual Purdue student athletes, which may include compensation to student athletes for the use of their name, image and likeness ("NIL"). SYM has no written agreement with Purdue Athletics regarding these

payments and is not contractually obligated to make them. This arrangement creates several conflicts of interest and potential risks, including:

- *Incentive to Generate Fees Rather Than Returns*. Because SYM's expected marketing expenditures, corporate sponsorships, and potential donations will be paid solely out of the Management Fee revenue, and not Fund performance, SYM has an incentive to maximize assets under management within the Fund, which may not align with investors' objective of maximizing risk-adjusted returns.
- *Use of Investor-Derived Fees for Purdue Athletics NIL, Marketing and Commercial Activities*. Because a substantial portion of Management Fees is expected to be deployed in connection with Purdue Athletics and related programs, many of which are designed to generate direct economic and business development benefits for SYM rather than the Fund; these expenditures may include, without limitation:
    - *Student-Athlete NIL Endorsements*. Compensation to Purdue student-athletes for endorsements of SYM, including promotional appearances, media content, and related marketing deliverables intended to enhance SYM's brand recognition and client acquisition efforts.
    - *Marketing and Brand Promotion Through Purdue Athletics*. Payments for sponsorships, promotional assets, media exposure, event access, and other advertising benefits to SYM.
    - *Corporate Sponsorships and Sponsored Programming*. Sponsorship of camps, clinics, or other events operated by student-athletes or Purdue-affiliated entities, structured as commercial arrangements that provide promotional value and visibility for SYM.
    - *Student-Athlete Internships and Workforce Programs*. Compensation to student-athletes employed or engaged by SYM in internship or similar roles, which may serve both operational needs and relationship-building or marketing objectives.
    - *Contributions to Purdue-Affiliated Organizations*. To the extent amounts are not deployed in the foregoing commercial activities, remaining funds will not be shared with the Fund but will instead be contributed to organizations such as the John Purdue Club or similar initiatives supporting Purdue Athletics. Such contributions would generate charitable deductions for SYM, which will not be shared by the Fund or any Investor.
- *Limited Transparency Around Calculation of Management Fees available for Purdue*. The amount of Management Fees available for SYM's expected marketing expenditures, corporate sponsorships, and potential donations will depend on allocations of expenses and overhead determined by SYM in its discretion. Such determinations may create conflicts regarding the timing and amount of donations. In addition, SYM is not contractually required to incur any marketing expenditures, corporate sponsorships or donations and may choose to terminate such payments and donations at any time.
- *Endorsements*. To the extent that student athletes or other persons endorse SYM, they are not SYM clients and may be compensated by SYM directly or indirectly. That compensation may give them an incentive to promote SYM, and prospective clients should consider this when evaluating any endorsement. SYM will provide the disclosures that the Marketing Rule requires. See Item 14.
- *Disclosure of Investor Information to Purdue Athletics*. SYM may disclose to representatives of Purdue Athletics the identity of an Investor and the amount of the Investor's investment in the Private Fund in

connection with these arrangements, but only if the Investor has consented to that disclosure in its subscription agreement. An Investor may decline to give, or may revoke, that consent at any time by written notice, and doing so will not affect the Investor's investment. SYM does not disclose any other personal or financial information about Investors to Purdue Athletics for this purpose. Please see the Private Fund's privacy notice for more information.

Recommendation of Other Investment Advisers

SYM may recommend other investment advisers for clients; but, does not receive any compensation related to its recommendation of other investment advisers other than any applicable management fee.

Item 11 – Code of Ethics, Participation/Interest in Client Transactions, Personal Trading

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

SYM and our personnel owe a duty of honesty, loyalty, prudence, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics, but to the general principles that guide the Code of Ethics.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Our Code of Ethics also requires the prior approval of acquisition of certain securities in order to mitigate risk of potential conflicts with client accounts. SYM also requires:

- That our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed; and
- That we periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm.

Our Code of Ethics also provides for oversight, enforcement and recordkeeping provisions.

SYM's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by emailing info@sym.com, or by calling us at 800-888-7968.

Item 12 – Brokerage Practices

In the event that the client requests that SYM recommend a broker-dealer/custodian for execution and/or custodial services, SYM generally recommends that investment advisory accounts be maintained at Charles Schwab & Co., Inc. ("Schwab"). SYM does manage assets maintained at other custodians, including Fidelity and National Advisors Trust Company. Prior to engaging SYM to provide Portfolio Management services, the client will be required to enter into a formal Advisory Agreement with SYM setting forth the terms and conditions under

which SYM shall advise on the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that SYM considers in recommending Schwab (or any other broker-dealer/custodian to clients) include historical relationship with SYM, financial strength, reputation, execution capabilities, pricing, research, and service. Although the transaction fees paid by SYM's clients shall comply with SYM's duty to obtain best execution, a client may pay a transaction fee that is higher than another qualified broker-dealer might charge to effect the same transaction where SYM determines, in good faith, that the transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, transaction rates, and responsiveness. Accordingly, although SYM will seek competitive rates, it may not necessarily obtain the lowest possible rates for client account transactions. The transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, SYM's investment advisory fee.

Non-Soft Dollar Research and Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, SYM can receive from Schwab (or another broker-dealer/custodian, investment manager, platform sponsor, mutual fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist SYM to better monitor and service client accounts maintained at such institutions. Included within the support services that can be obtained by SYM can be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support-including client events, computer hardware and/or software and/or other products used by SYM in furtherance of its investment advisory business operations.

SYM's clients do not pay more for investment transactions effected and/or assets maintained at Schwab as the result of this arrangement. There is no corresponding commitment made by SYM to Schwab, or any other entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement. Any questions: SYM's Chief Compliance Officer, Crystal Allen, remains available to address any questions that a client or prospective client may have regarding the above arrangements and the corresponding conflict of interest presented by such arrangements.

Directed Brokerage

SYM generally recommends that its clients utilize the brokerage and custodial services provided by Schwab. SYM may accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer/custodian). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and SYM will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by SYM. As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Please note: In the event that the client directs SYM to effect securities

transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through SYM. Higher transaction costs adversely impact account performance. Please also note: Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

Trade Aggregation and Allocation

In making investment decisions for client accounts, securities considered for investment by one account may also be appropriate for another account managed by SYM. When the purchase or sale of a security is deemed to be in the best interest of more than one account, SYM will aggregate or "block" orders for the purchase or sale of securities for all such accounts to the extent consistent with best execution and the terms of the relevant Portfolio Management agreements. Such combined or "blocked" trades may be used to facilitate best execution, including negotiating more favorable prices, obtaining more timely or equitable execution or reducing overall commission charges.

Client accounts with certain restrictions and directed brokerage may be unable to participate in blocked transactions. As mentioned above, the custodian where the account is held will usually determine which broker will be used. SYM generally will not aggregate trades for clients that may have limited SYM's brokerage discretion or other client accounts that it manages, to the extent that those clients have directed their trading to a particular broker-dealer. Orders for such clients will generally be aggregated only with similar clients and allocated in the same manner as described above. SYM may include proprietary accounts in such aggregate trades subject to its duty of seeking best execution and to its Code of Ethics.

Item 13 – Review of Accounts

Portfolio Management and Wealth Management

While the underlying securities within Portfolio Management services accounts are continually monitored, these accounts are reviewed on a regular basis. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

Accounts are reviewed by the Financial Advisor assigned to the particular client on a quarterly basis. Such reviews are also supported by SYM's Client Service Team.

If a client only receives Financial Planning services, those accounts may be reviewed less frequently than quarterly.

In addition to the statements and confirmations of transactions that clients receive from their custodian, SYM provides access to our client portal which depicts account performance, balances and holdings.

With respect to our Portfolio Management clients utilizing Automated Platforms, SYM offers to meet with these clients at least annually and urges them to notify SYM, if there are circumstances that may warrant a change to their existing portfolio.

Financial Planning Projects

While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no ongoing formal reviews will be conducted for Financial Planning Project clients, unless otherwise specifically outlined in the engagement. Additional reports will not typically be provided unless otherwise contracted for.

Qualified Plan Consulting

SYM will review the client's Investment Policy Statement (IPS) whenever the client advises us of a change in circumstances regarding the needs of the plan. SYM will periodically review the investment options of the plan. These accounts are reviewed by SYM's Investment Committee, as well as the Financial Advisor assigned to the particular client. Such reviews are also supported by SYM's Client Service Team. In addition, investment reviews will be held at the frequency of the agreed upon time intervals established by the plan sponsor.

Private Fund

SYM's Investment Committee reviews the Private Fund's investment in the Apollo Fund. Each Investor in the Private Fund will receive annual audited financial statements in accordance with the Custody Rule.

Item 14 – Client Referrals and Other Compensation

As indicated in Item 12 above, SYM can receive from Schwab (Fidelity, and/or others) without cost (and/or at a discount), support services and/or products. SYM's clients do not pay more for investment transactions effected and/or assets maintained at Schwab (or any other institution) as result of this arrangement. There is no corresponding commitment made by SYM to Schwab, or to any other entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as the result of the above arrangement. Any questions: SYM's Chief Compliance Officer, Crystal Allen, remains available to address any questions that a client or prospective client may have regarding the above arrangements and the corresponding conflict of interests presented by such arrangements.

Except as described below, SYM does not maintain solicitor arrangements with, or pay referral fees to, third parties for new client introductions.

Endorsements and Marketing Payments. SYM may compensate Purdue student athletes, or programs and organizations affiliated with Purdue Athletics, for promotional and marketing activities that may increase awareness of SYM and help SYM attract clients. Payments may be made directly to individual student athletes or to Purdue affiliated programs and organizations for their general use, and SYM expects to receive certain marketing benefits in exchange. Any person who endorses SYM is not a client, may be compensated directly or indirectly by SYM, and may have an incentive to speak favorably about SYM, which creates a conflict of interest. SYM will provide the disclosures and follow the other requirements of the Marketing Rule that apply to any compensated endorsement. See Item 10.

Item 15 – Custody

Wealth Management

We previously disclosed in the Fees and Compensation section in Item 5 of this Brochure that our firm directly debits advisory fees from client accounts.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement. Please note: The account custodian does not verify the accuracy of SYM's advisory fee calculation.

In addition to the periodic statements that clients receive directly from their custodians, SYM provides access to our client portal where clients can view account transactions online. We urge our clients to carefully compare the information provided by us to ensure that all account transactions, holdings and values are correct and current.

SYM engages in practices and/or services on behalf of its clients that require disclosure in Item 9 of Part 1 of Form ADV, which practices and/or services are subject to an annual surprise CPA examination in accordance with the requirements of Rule 206(4)-2 under the Investment Advisers Act of 1940. However, these authorizations, in accordance with the guidance provided in the SEC's February 21, 2017, Investment Adviser Association No-Action Letter, are not subject to an annual surprise CPA examination. In addition, certain clients have established asset transfer authorizations that permit the qualified custodian to rely upon instructions from SYM to transfer client funds or securities to third parties.

Private Fund

The Private Fund will deliver annual audited financial statements to Investors in accordance with the Custody Rule.

Item 16 – Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

Item 17 – Voting Client Securities

Wealth Management

SYM does not vote proxies on behalf of clients. Therefore, although our firm may provide Portfolio Management advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type of events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

Private Fund

SYM does not expect to receive proxies for investments held in the Private Fund. However, the Private Fund's principal asset is its interest in the Apollo Fund, which from time to time may ask its investors to vote on or consent to matters. Under the IMA, SYM determines how the Private Fund votes or consents with respect to its interests in the Apollo Fund and any other underlying fund. SYM will do so in accordance with its fiduciary duty to the Private Fund and its proxy voting policies and procedures, and will generally seek to vote in a way that SYM believes in good faith will maximize the value of the Private Fund's assets. The incentives described in Item 10 could influence how SYM votes, and SYM's policies are designed to identify and address those conflicts. In some cases the Apollo Fund's governing documents may limit or exclude the Private Fund's ability to vote. Investors may obtain a copy of SYM's proxy voting policies and information about how SYM has voted by contacting SYM's Chief Compliance Officer.

Item 18 – Financial Information

Under no circumstances do we require or solicit payment of fees in excess of $1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations. SYM has no additional financial circumstances to report.

SYM has not been the subject of a bankruptcy petition at any time during the past ten years.

Any Questions: SYM's Chief Compliance Officer, Crystal Allen, MBA, remains available to address any questions that a client or prospective client may have regarding any and all of the information discussed above regarding SYM's ADV Part 2A Brochure.