MML Investors Services
FORTUNA

Program & Procedure Guide

This guide is intended as a reference for the Fortuna product and its unique features and functionality. Please Note: Fortuna is closed to new business, effective November 3, 2021.

If you need assistance or have questions, please contact Fortuna Support at FortunaVIP@massmutual.com or (855) 877-6164.

Program & Procedure Guide

Responsibilities of the Advisor with Fortuna

IA-Reps are required to:

- Read and understand the Fortuna Program and Procedures guide;
- Read and understand the requirements noted in the MMLIS Field Compliance manual;
- Read and understand any platform specific education materials;
- Keep their ADV 2B up to date through Advisor Settings in the Advisor Dashboard.

Advisors maintain an ongoing fiduciary duty to their clients with Fortuna.

Ongoing fiduciary responsibilities

- To act solely in the client's best interest and to make full and fair disclosure of all material facts and conflicts of interest.
- Consider
  - Broker-Dealer Relationship vs. Advisor Relationship
    - Whether a client is willing to pay an ongoing fee for investment management.
  - Non-Discretionary vs. Discretionary Relationship
    - Whether a client wants to maintain decision making authority or delegate specific decisions to a portfolio manager.
  - Take into account the program minimum investment amount, securities/products available, special program features and whether digital advice makes sense for your client.
  - Advisors need to document the rationale for selection or replacement of the advisor program.
  - Advisors should also continue to assess the ongoing effectiveness of the program in serving the client's needs.

Annual contact and continued suitability

- The advisor will be available to assist with client inquiries, if any, during regular business hours.
- The automated annual client contact, delivered via email by FutureAdvisor, can suffice for a client's annual review, however, should a client have questions or want to discuss any life- changes that might impact their investments, advisors must respond, make themselves available, and document the discussion and potential changes accordingly.
- Suitability checks during enrollment may prompt a client to contact you for more details. Fortuna client eligibility requirements are as follows:
  - Between 18 and 70 years old
  - Have a five year or more investment time horizon
  - U.S. resident and citizen
  - Have at least $5,000 in investable assets per goal
  - Have valid Social Security number
- The Risk Tolerance Questionnaire may prompt questions pertaining to a client's suggested risk tolerance.

Field Management - Supervisory Responsibilities

Supervisors should have general knowledge of the Fortuna product so they can perform regular supervisory functions such as email review, answering general questions, etc.; and complete any required training, including reading the Fortuna Program and Procedure Guide, field communications/bulletins.

Program Description and Roles and Responsibilities

Fortuna is an investment advisory service offered by MMLIS. It is an automated digital investment management platform that provides advisors and clients with a robust on-demand wealth management interface, coupled with the long-term focus on financial goals provided by an established advisor/client relationship.

MML Investors Services, LLC (MMLIS)
MMLIS is a broker-dealer and registered investment adviser providing a wide array of investment products and services, including Fortuna. MMLIS and its financial advisors have a fiduciary obligation to act in the best interest of clients. Fortuna is an advisory service offered by MML Investors Services, LLC (MMLIS).

FutureAdvisor
Fortuna is subadvised by FutureAdvisor, a registered investment advisor and wholly owned subsidiary of BlackRock, Inc. Fortuna uses proprietary, automated, computer algorithms of FutureAdvisor to manage and rebalance client portfolios. The asset allocation and securities portfolios generated by Fortuna are constructed by the BlackRock Multi Asset Strategies group. FutureAdvisor is responsible for the digital technology and platform Fortuna runs on.

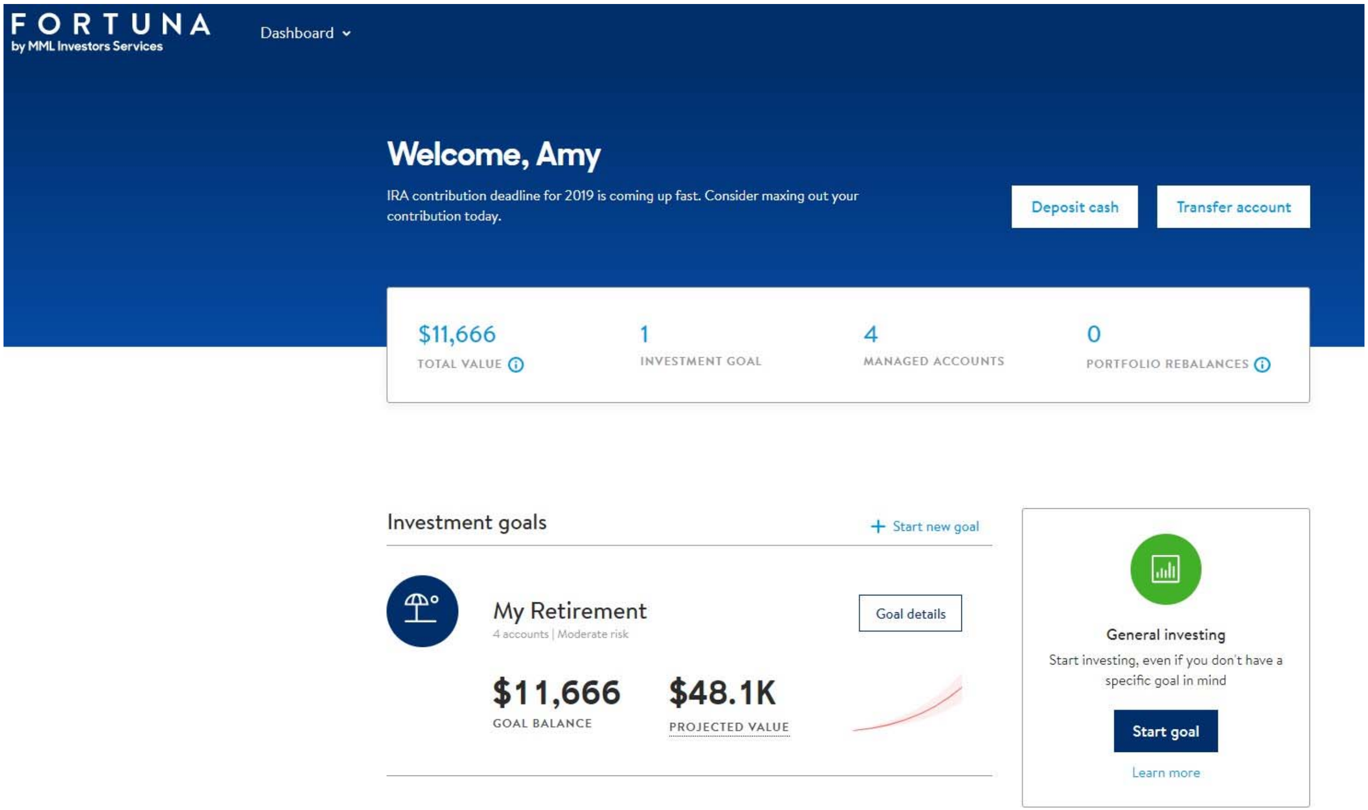
Fortuna Support
Fortuna Support is a dedicated MMLIS team that will handle operations and services for MMLIS, its financial advisors and clients. Fortuna Support can work directly with your clients or in coordination with you.

National Financial Services LLC (NFS)
MMLIS uses National Financial Services LLC (NFS) to custody client assets and execute trades. Account details and documents will be available for both you and your clients in Wealthscape, similar to your other propCRIA accounts.

Fortuna – Managed Client Experience

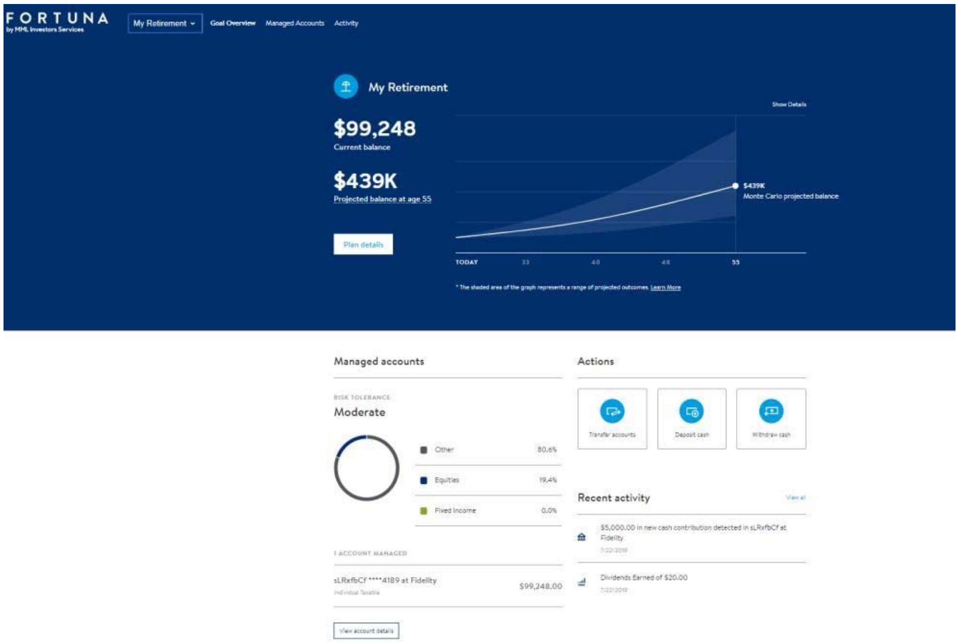
a. Client Dashboard (Overview)

When clients log into Fortuna, they're taken to their Managed Client Dashboard, which will show them an overview of their established goals, managed accounts total and portfolio rebalances.

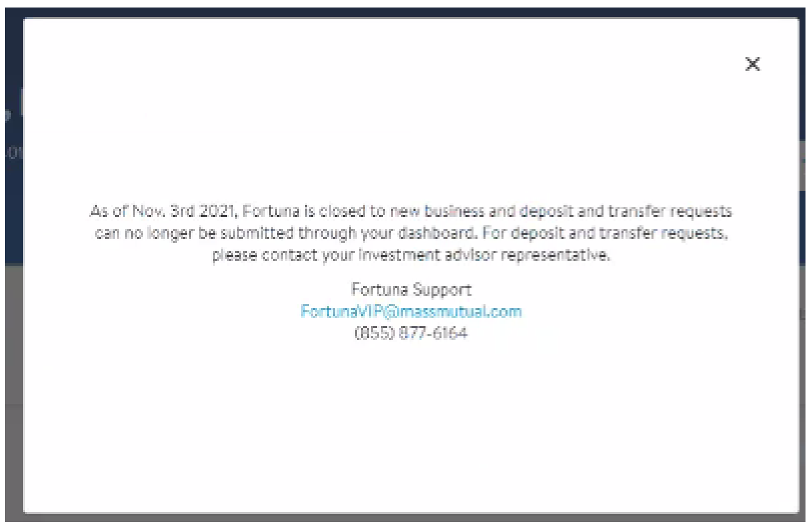


The client will be able to click into a specific goal detail by clicking on the Goal Details button or selecting their goal in the Dashboard drop down at the top left.

The Client Dashboard displays a summary of the client's current Fortuna portfolio value, projected account value at the projected time horizon, risk tolerance, recent account activity and the accounts that are included in the managed experience. The client will also be able to request a withdrawal from this page.

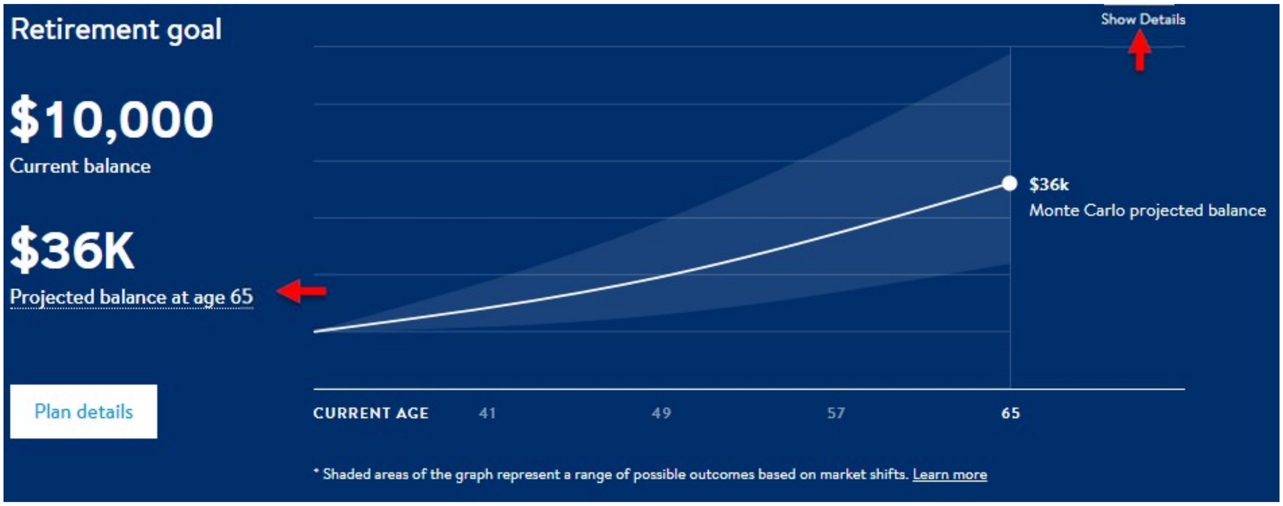


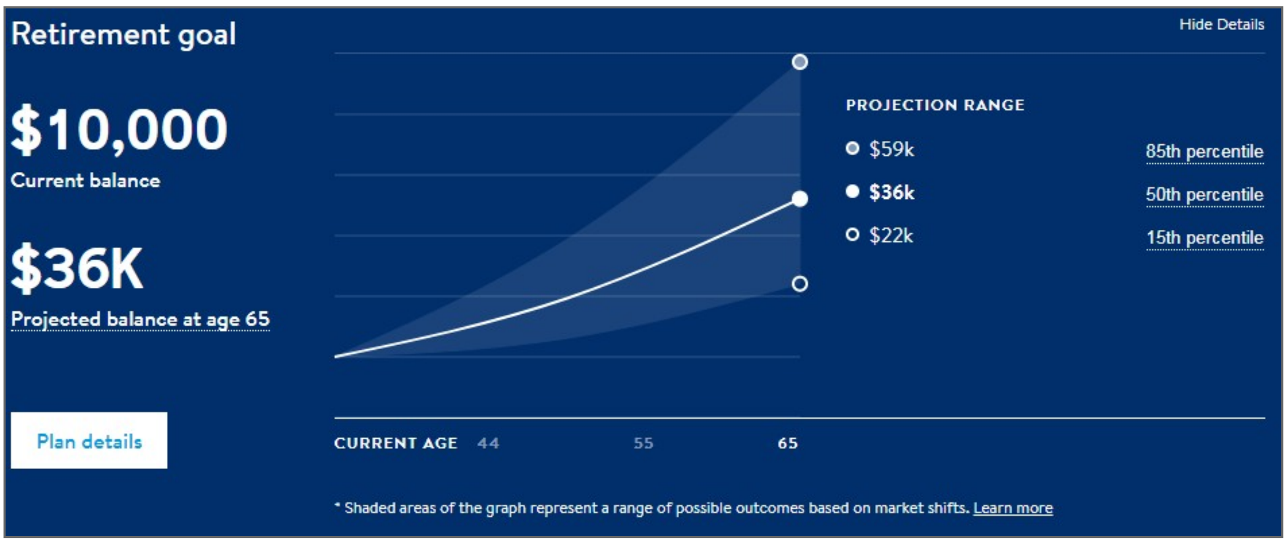
Please Note: the buttons labeled Start Goal, Start New Goal, Deposit cash and Transfer account will be disabled as of November 3. 2021. If a client clicks on any of these buttons the following error message will appear:



Projected Account Value

The projected account value at the client's investment time horizon is an estimate, based on the client's asset allocation and time horizon using forward looking capital market assumptions. Fortuna runs 6,000 Monte Carlo simulations and then uses the outcome with a 50% probability (i.e., the 50th percentile of outcomes).

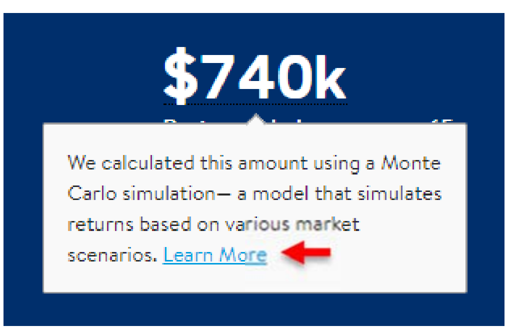




The client can click on "Show Details" to see the range of projections from a best case (85th percentile) to worst case (15th percentile) scenario based on the Monte Carlo simulations.

It's important to note that only the accounts being directly managed by Fortuna will be included in total assets and projection totals.

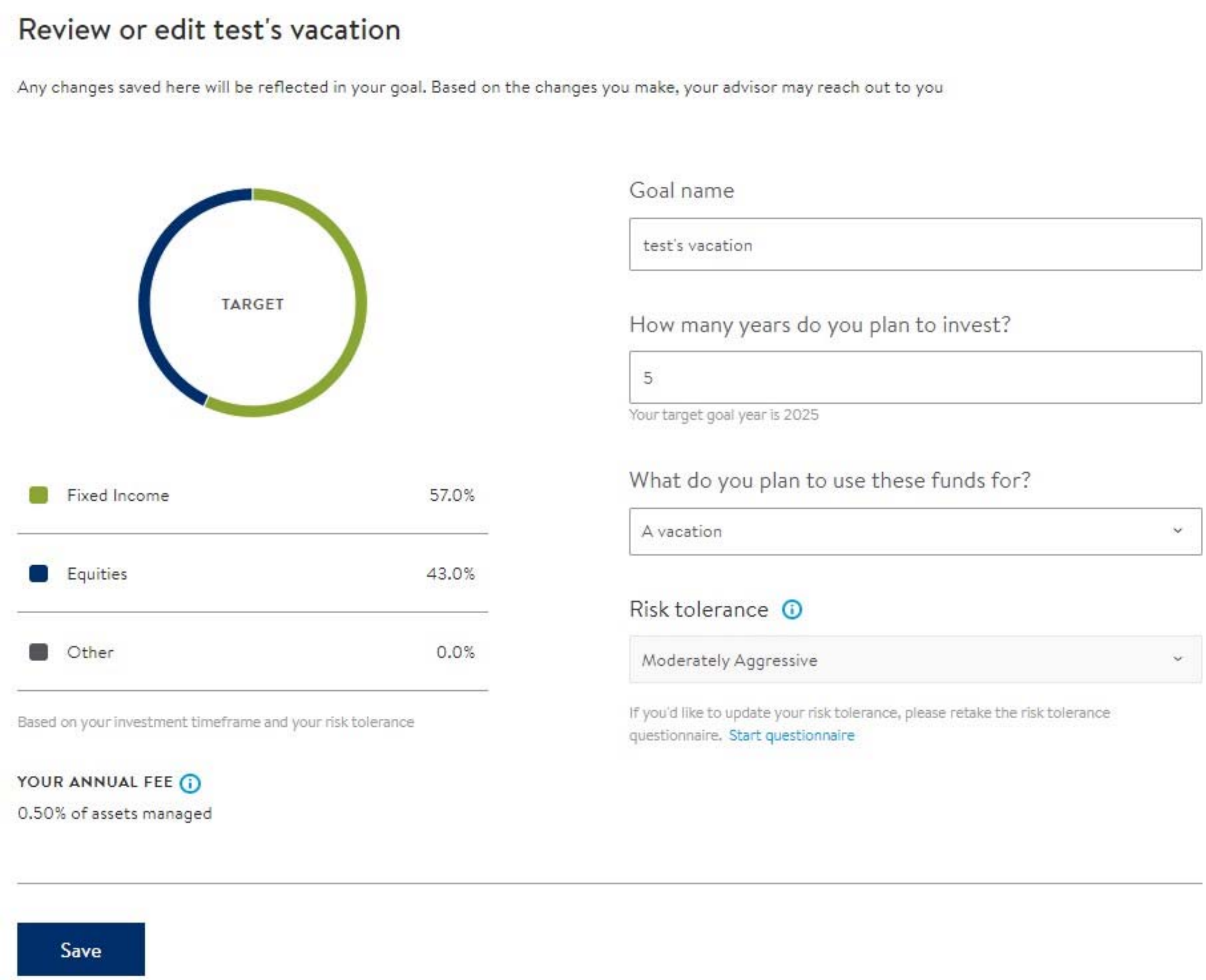
The client can also hover over their projected account value, to read a short description of how the projection is calculated. They can get more projection information by clicking on "Learn More" to be directed to the Methodologies and Assumptions page.



Plan Details

The client will have the ability to change their investment time horizon and risk tolerance by clicking on "Plan details". **It is important to note that only a change to the client's investment time horizon and/or risk tolerance will have an impact to the recommended asset allocation.**

If the edits result in a new investment objective, the portfolio and its associated accounts may be traded and rebalanced to meet the desired recommended asset allocation. Fortuna may limit trading frequency due to explicit trading costs, minimizing potential short-term taxable gains, and adhering to the wash sale rule with regards to tax loss harvesting.



Recommended Asset Allocation

The client's recommended asset allocation is determined by their investment time horizon and risk tolerance and is shown in the pie chart. The pie chart displays the Equities/Fixed Income split in percentage terms. The client can click on the information icon "i" next to the Risk tolerance to get a short description of what each risk tolerance means.

Risk tolerance

Conservative

If you'd like to update your risk tolerance, please retake the risk tolerance questionnaire. Start questionnaire

Risk tolerance

Risk tolerance is the degree of variability in investment returns and asset values that an investor is willing to withstand.

Conservative

You are comfortable with the prospect of investing more to offset the expected lower returns of a conservative strategy. This strategy avoids as much risk as is prudent emphasizing fixed income investments and including little, if any, equity investments as is suitable for your time horizon.

Moderately Conservative

You are comfortable with a strategy that expects slightly lower returns and seeks to limit short term volatility. This strategy focuses less on equity investments and more on fixed income investments than a more moderate approach would for your time horizon.

Moderate

You seek to balance risk and growth. This strategy includes reasonably balanced amounts of equity and fixed income investments for your time horizon.

Moderately Aggressive

You prefer to take more risk in the near term in favor of potential greater growth in the long term. This strategy focuses more on equity investments and less on fixed income investments than a more moderate approach would for your time horizon.

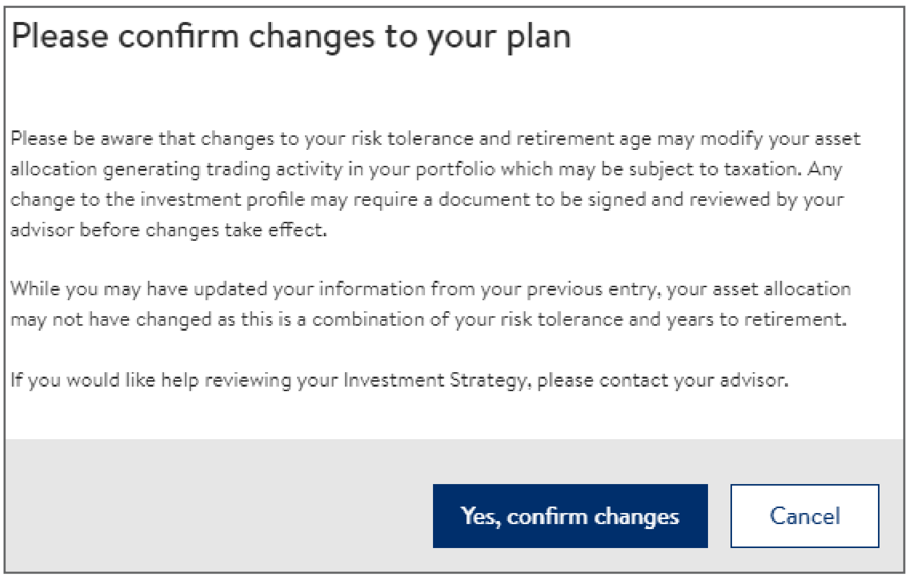
Aggressive

You prefer a higher level of risk and potential growth throughout your investment horizon. This strategy emphasizes equity investments and include little, if any, fixed income investments as is suitable for your time horizon.

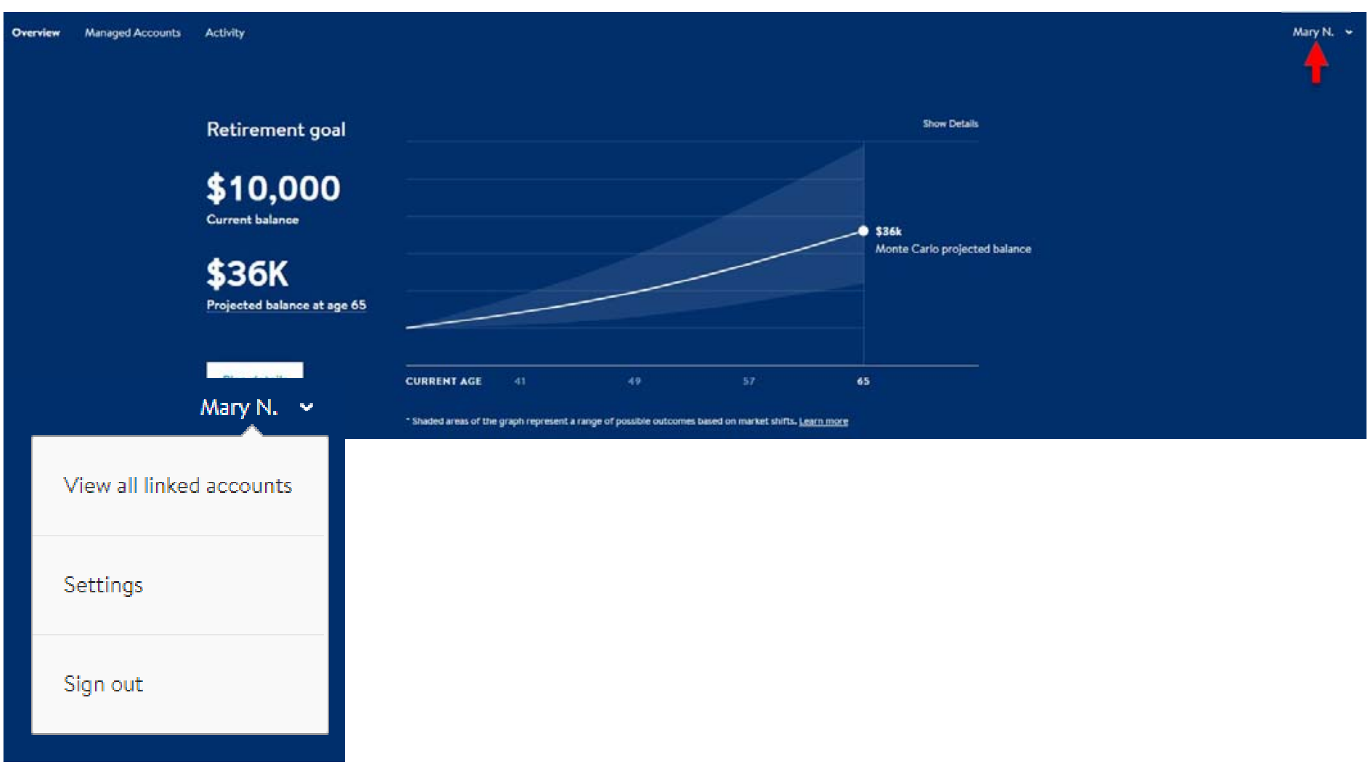
As you know, clients in Fortuna are placed into one of five risk tolerances based on their response to our risk tolerance questionnaire. While clients will continue to see their risk tolerance on the Fortuna site, as part of the A360 conversion, on the A360 site, clients will be mapped to a corresponding investment objective based on the chart below.

Fortuna (Risk Tolerance)	A360 (Investment Objective)
Conservative	Income with Limited Growth
Moderately Conservative	Income with Moderate Growth
Moderate	Growth and Income
Moderately Aggressive	Primarily Growth
Aggressive	Growth

The client can change their risk tolerance at their own discretion. However, it is strongly advised that clients pick a tolerance and strategy they feel comfortable having for the long-term. The client must click "Save" for any of their changes to be implemented. Once the client clicks "Save" they will need to confirm the change in investment strategy. After confirmation, they will be redirected back to the overview page.



Client Profile

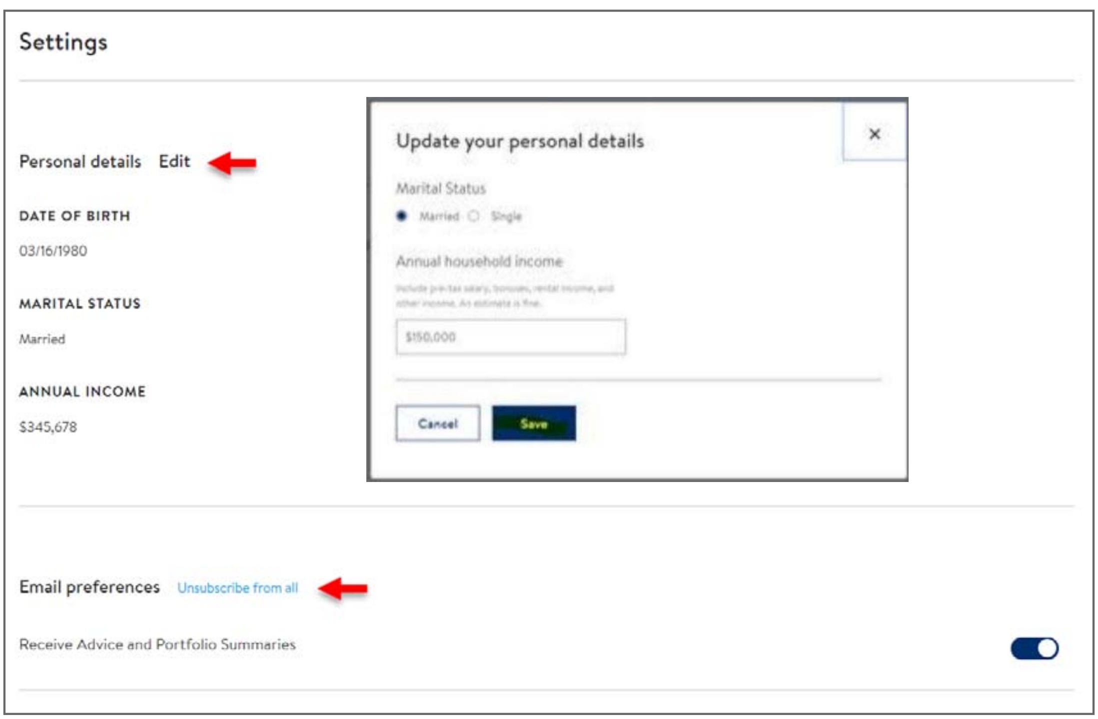


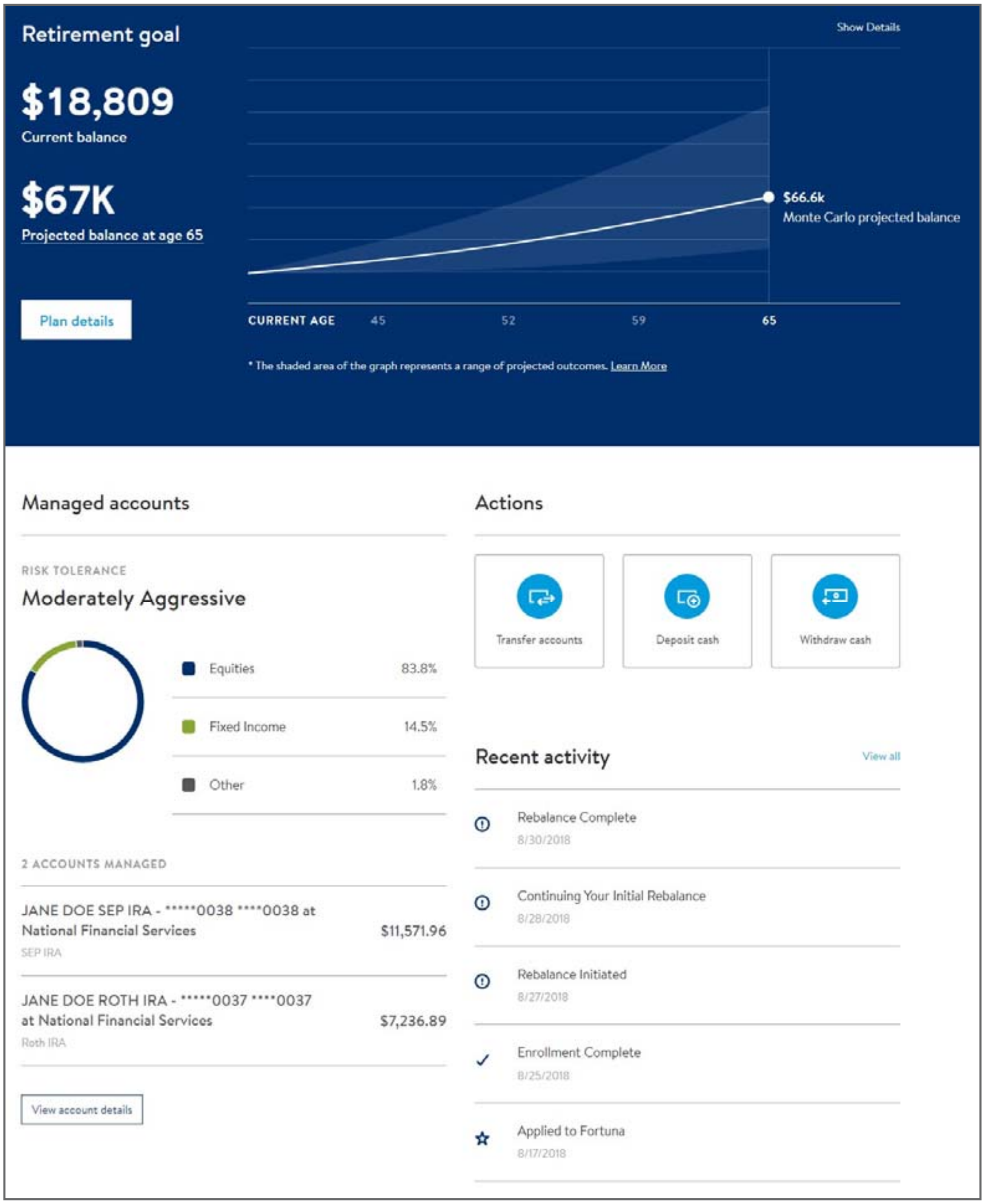
By clicking the client's name, the client will find the settings tab and sign out option. The client will also be able to see their managed accounts by clicking "View all linked accounts".

Settings – Personal details and Email preferences

The client can change their marital status and annual income on the "Settings" page. Click the "Edit" button to update their personal details.

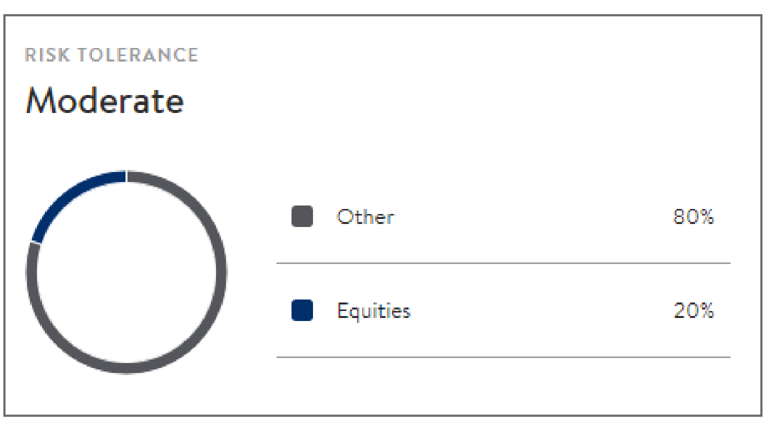
The client has the option to unsubscribe from receiving email notifications. They can globally unsubscribe from emails except for the annual contact email and can re-subscribe at any time.



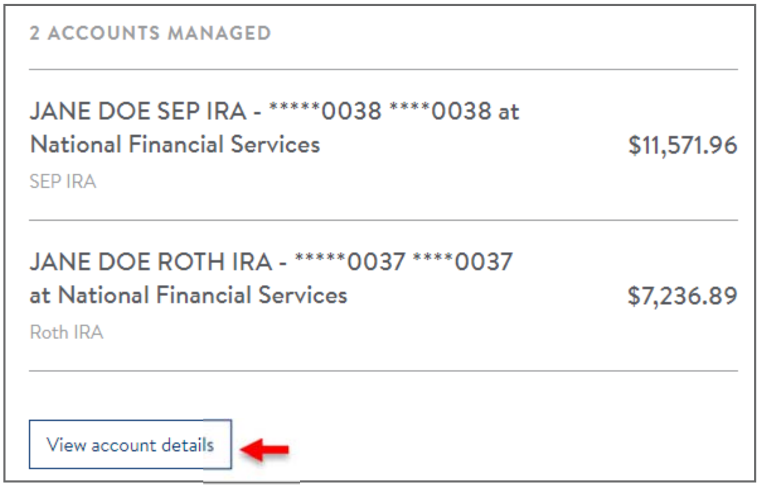


Risk Tolerance

The client's risk tolerance is prominently displayed along with the asset allocation breakdown.



Managed Accounts

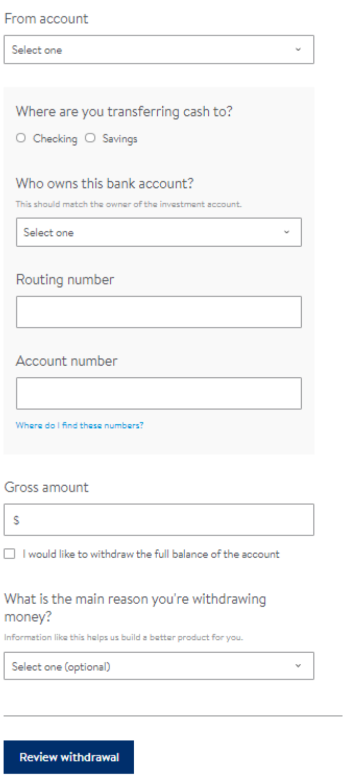


All the accounts managed by Fortuna will be displayed on the overview page. By clicking "View account details" the client will be directed to the "Managed Accounts" screen where they can find more detailed account information. The client can also click "Managed Accounts" from the top of their overview page to be directed to the "Managed Accounts" page.

Withdrawal Cash

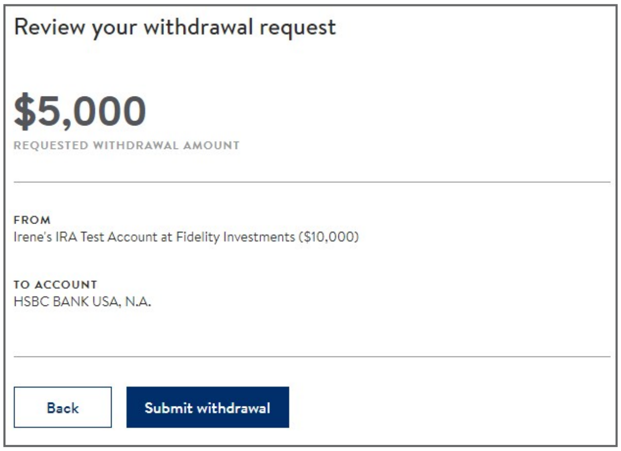
Step 1:

After clicking the 'Withdraw Cash' tile, choose the appropriate Fortuna account the cash will be withdrawn from and the outside bank account the proceeds will be transferred to. The client can then choose to enter in the dollar amount of the withdrawal or request the full account balance. If the monies are withdrawn from a tax deferred account, the client has the option to have taxes withheld. The client will then click "Review withdrawal".



Step 2:

After reviewing the withdrawal request information click “Review withdrawal”

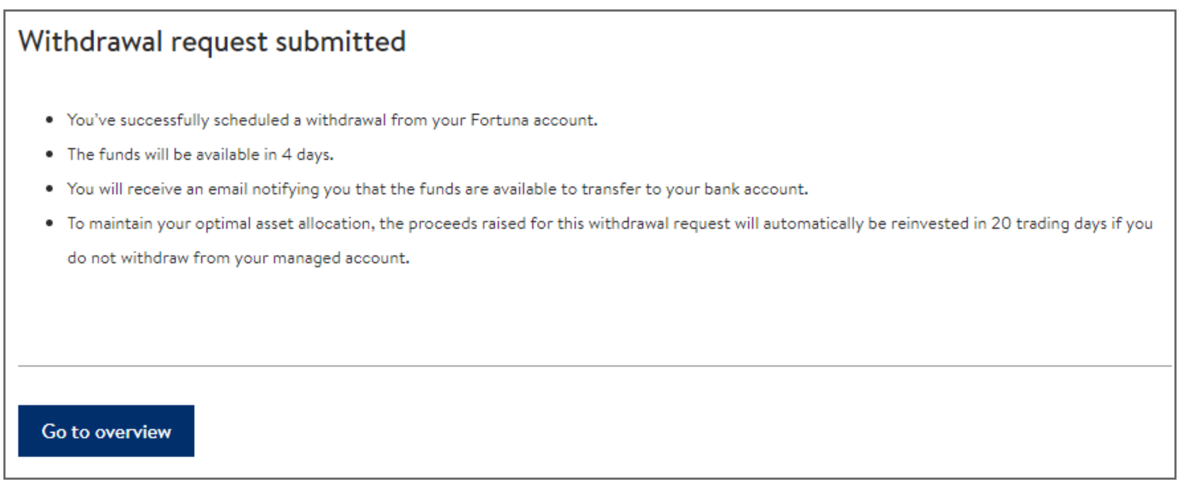


Step 3:

Once they click on “Submit withdrawal,” they will be taken to DocuSign to confirm their identity and sign paperwork.

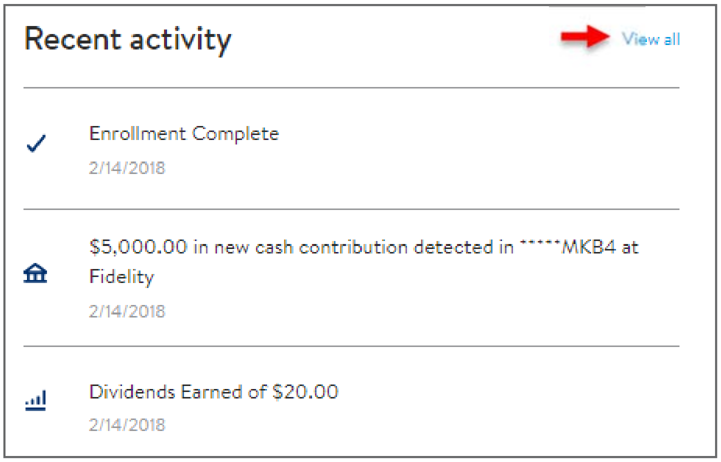
Step 4:

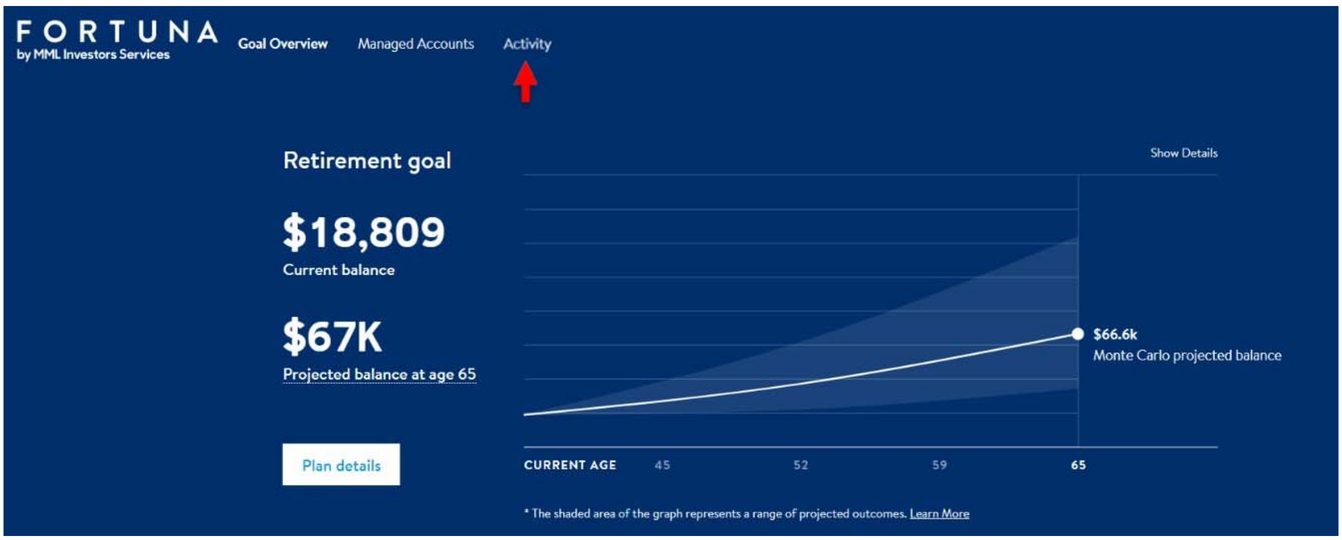
Click “Go to overview” to return to the Client Dashboard.



Recent Activity

Within the ‘Recent Activity’ section, the client will be able to see the most recent account activities on the main overview screen. If the client wants to see additional account activities, they can click “View all” which will lead them to the “Activity” page. The client can also go directly to the activity page by clicking “Activity” found on the top of the overview page.



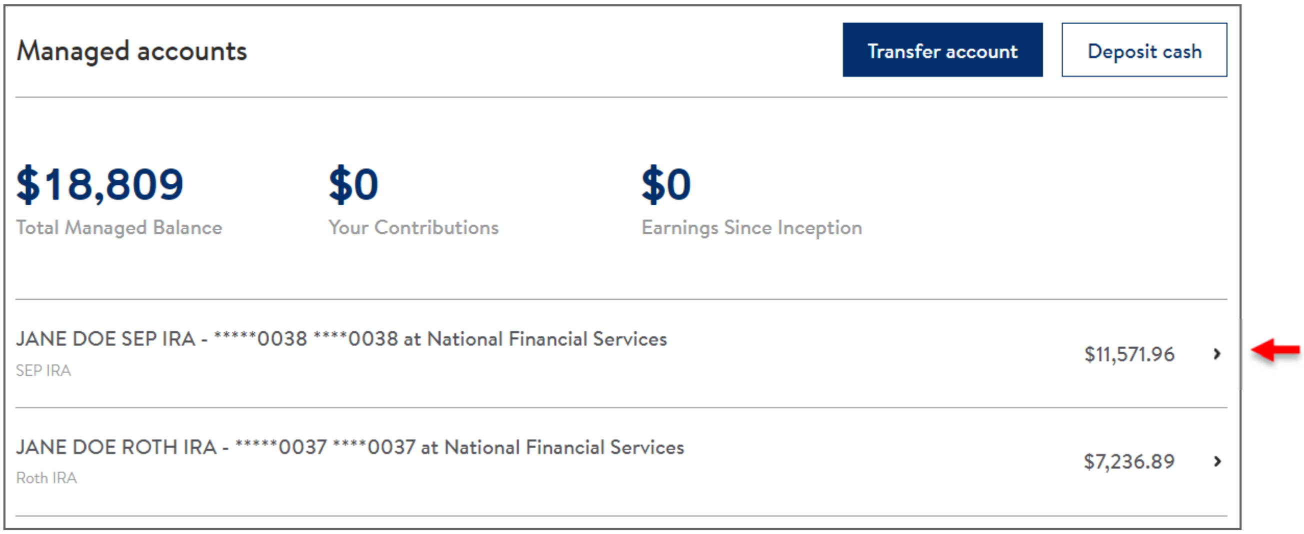


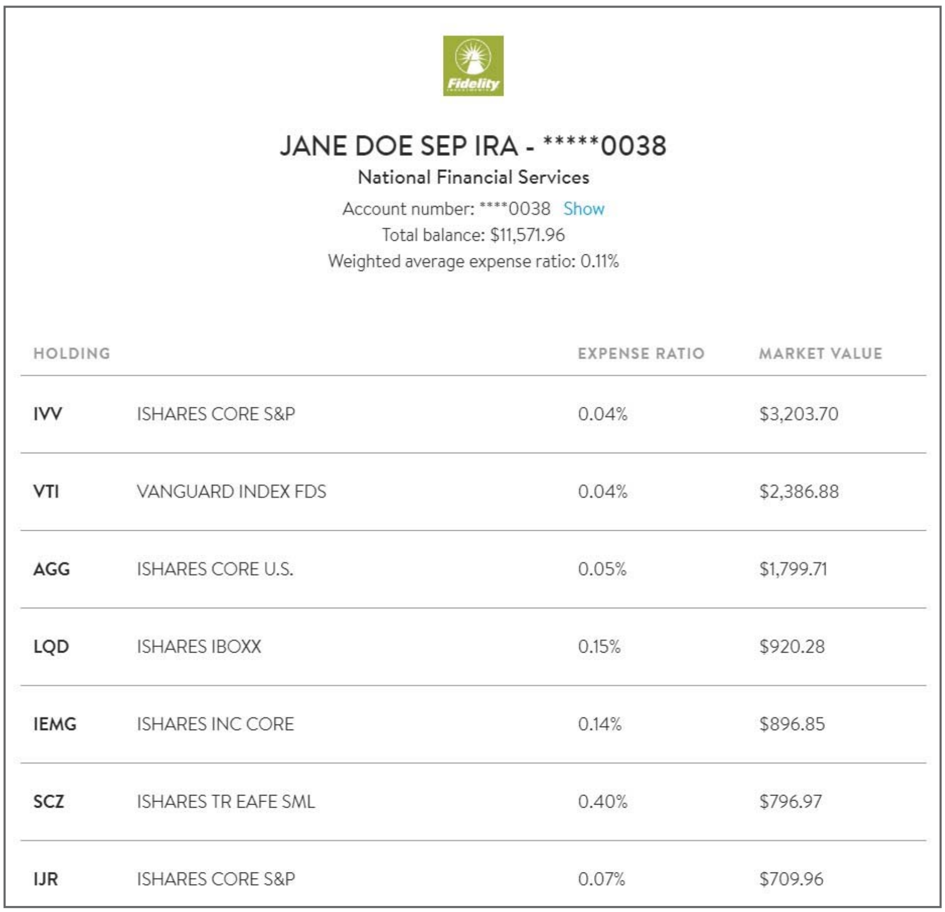
b. Managed Accounts

The client will see their total portfolio value, total contributions, and total earnings in dollar terms since inception on their Fortuna managed accounts page.

Account Details

The client can click into each Fortuna managed account to see the weighted average expense ratio of the account and more detailed information about the underlying investments held within each account. Each ETF with its ticker symbol, name, expense ratio and market value will be displayed.




JANE DOE SEP IRA - *****0038

National Financial Services

Account number: ****0038 Show

Total balance: $11,571.96

Weighted average expense ratio: 0.11%

HOLDING		EXPENSE RATIO	MARKET VALUE
IVV	ISHARES CORE S&P	0.04%	$3,203.70
VTI	VANGUARD INDEX FDS	0.04%	$2,386.88
AGG	ISHARES CORE U.S.	0.05%	$1,799.71
LQD	ISHARES IBOXX	0.15%	$920.28
IEMG	ISHARES INC CORE	0.14%	$896.85
SCZ	ISHARES TR EAFE SML	0.40%	$796.97
IJR	ISHARES CORE S&P	0.07%	$709.96

Portfolio Allocation

The client's chosen risk tolerance along with the asset allocation breakdown will be displayed. A Fortuna managed client should expect their "target" and "current" asset allocation percentages to be identical. If their current allocation is different from their target allocation, it is likely that the client has a locked position.

The client can click on "View allocation details" to see a side-by-side comparison of the target and current asset allocation for each asset class held within the portfolio.

View allocation details

ASSET CLASS	TARGET	CURRENT
Equities	85.0%	83.8%
Fixed Income	15.0%	14.5%
Other	0.0%	1.8%

Your current portfolio may not match your target portfolio because of market movements or the cost of rebalancing

Portfolio allocation

$18,809
TOTAL MANAGED BALANCE

Moderately Aggressive
RISK TOLERANCE

Your current portfolio may not match your target portfolio because of market movements or the cost of rebalancing

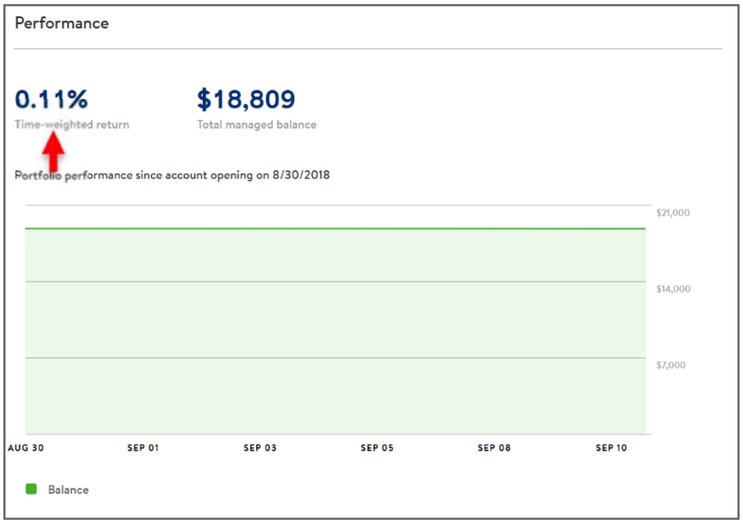
83.8% Equities 14.5% Fixed Income 1.8% Other

ASSET CLASS	TARGET	CURRENT
US Equity Large	42%	43%
International Equity Total	18%	17%
US Equity Value	10%	10%
Emerging Markets Equity	7%	6%
US Equity Small	4%	4%
International Equity Small	4%	4%
Broad US Bonds	10%	10%
Corporate US Bonds	5%	5%
Cash	0%	2%

Performance

Clients see total portfolio performance since their portfolio was first rebalanced by Fortuna, referred to as “since account opening”. This view shows the time-weighted performance of their portfolio since becoming a Fortuna managed portfolio.

The portfolio’s performance is calculated using standard time-weighted performance calculations. The first day of performance is the day the client’s initial portfolio rebalance is completed and the trades have settled in the portfolio. Since trade settlement is T+2 (trading day plus two market days), there may be a small difference in the anticipated starting value performance seen on the Client Dashboard. By hovering over “time weighted return,” clients can read a brief description of how time weighted returns are calculated.


Performance
0.11%
Time-weighted return
$18,809
Total managed balance
Portfolio performance since account opening on 8/30/2018
$21,000
$14,000
$7,000
AUG 30
SEP 01
SEP 03
SEP 05
SEP 08
SEP 10
Balance

Fortuna – Portfolio Investments and Strategy

Risk Tolerance Questions

The Risk Tolerance Questions will assess the investor's risk profile and assign them to one of three investment allocation tracks (referred to as glidepaths) for retirement and major purchase goals. For general investing, the risk tolerance is the primary driver of the recommended portfolio.

Risk Tolerance Questionnaire (RTQ):

1. How would you react if the market saw a downward swing of more than 20%?
   - ☐ Do nothing
   - ☐ Invest substantially more into my investments
   - ☐ Invest a little more in the markets
   - ☐ Sell some investments
   - ☐ Sell everything

2. How you choose to invest is usually a tradeoff between potential gains and the risk of loss. Which of the following statements describes your approach to investing?
   - ☐ Minimizing loss is somewhat more important than maximizing gains
   - ☐ Minimizing loss is a lot more important than maximizing gains
   - ☐ Minimizing loss and maximizing gains are equally important
   - ☐ Maximizing gains is somewhat more important than minimizing loss
   - ☐ Maximizing gains is a lot more important than minimizing loss

3. Generally, I prefer investments that don't dramatically rise and fall in value even if they come with potentially lower returns.
   - ☐ Strongly agree
   - ☐ Agree
   - ☐ Somewhat agree
   - ☐ Disagree
   - ☐ Strongly disagree

4. Where would you be most comfortable placing yourself on the risk tolerance scale from 1 to 5?

a. Investment Strategies (Portfolio Types) Offered

Ordered from aggressive to conservative:

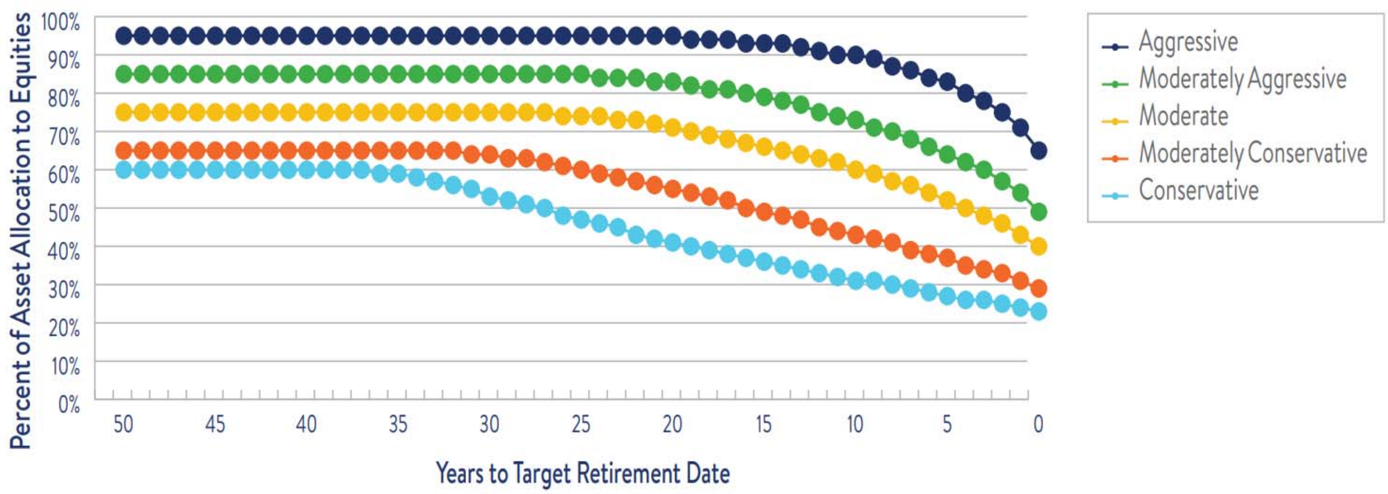
1. Aggressive
2. Moderately Aggressive
3. Moderate
4. Moderately Conservative
5. Conservative

Glidepaths

Based on their risk tolerance, clients are assigned to one of five investment allocation tracks (referred to as glidepaths).

<u>Retirement Glidepaths</u> *(as of 09/22/2021)*

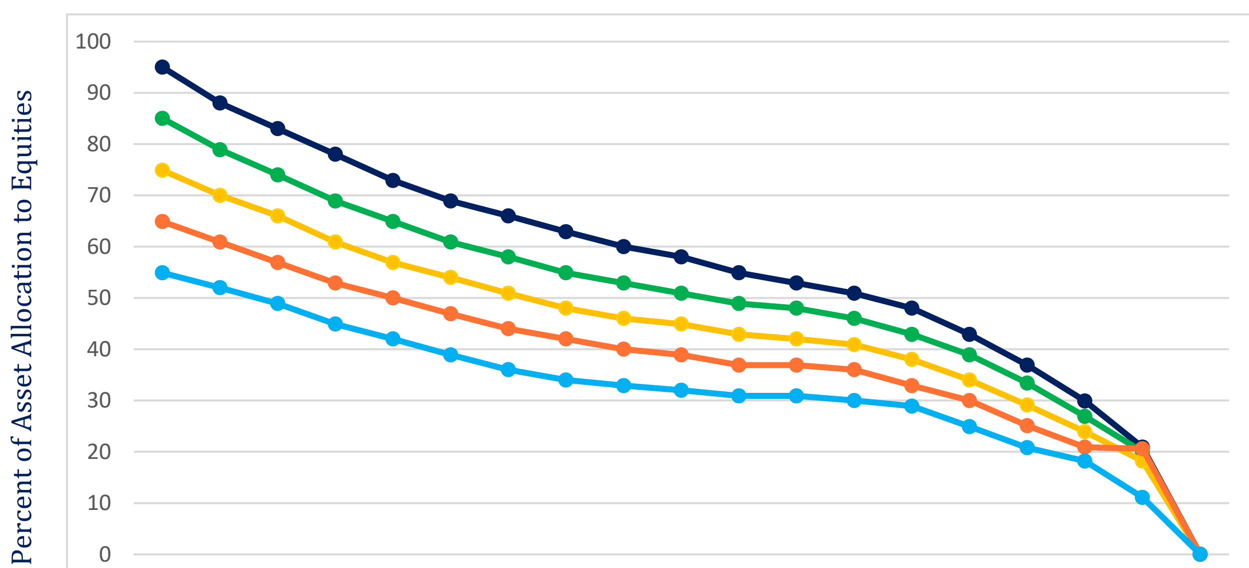
As a client ages toward retirement, Fortuna will automatically adjust the client's asset allocation to include more fixed income and less equity. See below for an example of how each of the glidepaths correspond with the investment objectives as the client progresses in age.



Years to Retirement	Aggressive		Moderately Aggressive		Moderate		Moderately Conservative		Conservative	
	Equity	Fixed	Equity	Fixed	Equity	Fixed	Equity	Fixed	Equity	Fixed
50	95%	5%	85%	15%	75%	25%	65%	35%	60%	40%
49	95%	5%	85%	15%	75%	25%	65%	35%	60%	40%
48	95%	5%	85%	15%	75%	25%	65%	35%	60%	40%
47	95%	5%	85%	15%	75%	25%	65%	35%	60%	40%
46	95%	5%	85%	15%	75%	25%	65%	35%	60%	40%
45	95%	5%	85%	15%	75%	25%	65%	35%	60%	40%
44	95%	5%	85%	15%	75%	25%	65%	35%	60%	40%
43	95%	5%	85%	15%	75%	25%	65%	35%	60%	40%
42	95%	5%	85%	15%	75%	25%	65%	35%	60%	40%
41	95%	5%	85%	15%	75%	25%	65%	35%	60%	40%
40	95%	5%	85%	15%	75%	25%	65%	35%	60%	40%
39	95%	5%	85%	15%	75%	25%	65%	35%	60%	40%
38	95%	5%	85%	15%	75%	25%	65%	35%	60%	40%
37	95%	5%	85%	15%	75%	25%	65%	35%	60%	40%
36	95%	5%	85%	15%	75%	25%	65%	35%	59%	41%
35	95%	5%	85%	15%	75%	25%	65%	35%	59%	41%
34	95%	5%	85%	15%	75%	25%	65%	35%	58%	42%
33	95%	5%	85%	15%	75%	25%	65%	35%	57%	43%
32	95%	5%	85%	15%	75%	25%	65%	35%	56%	44%
31	95%	5%	85%	15%	75%	25%	64%	36%	55%	45%
30	95%	5%	85%	15%	75%	25%	64%	36%	53%	47%
29	95%	5%	85%	15%	75%	25%	63%	37%	52%	48%
28	95%	5%	85%	15%	75%	25%	63%	37%	51%	49%
27	95%	5%	85%	15%	75%	25%	62%	38%	50%	50%
26	95%	5%	85%	15%	74%	26%	61%	39%	48%	52%
25	95%	5%	85%	15%	74%	26%	60%	40%	47%	53%
24	95%	5%	84%	16%	74%	26%	59%	41%	46%	54%
23	95%	5%	84%	16%	73%	27%	58%	42%	45%	55%

22	95%	5%	84%	16%	73%	27%	57%	43%	43%	57%
21	95%	5%	83%	17%	72%	28%	56%	44%	42%	58%
20	95%	5%	83%	17%	71%	29%	55%	45%	41%	59%
19	94%	6%	82%	18%	70%	30%	54%	46%	40%	60%
18	94%	6%	81%	19%	69%	31%	53%	47%	39%	61%
17	94%	6%	81%	19%	68%	32%	52%	48%	38%	62%
16	93%	7%	80%	20%	67%	33%	50%	50%	37%	63%
15	93%	7%	79%	21%	66%	34%	49%	51%	36%	64%
14	93%	7%	78%	22%	65%	35%	48%	52%	35%	65%
13	92%	8%	77%	23%	64%	36%	47%	53%	34%	66%
12	91%	9%	75%	25%	63%	37%	45%	55%	33%	67%
11	90%	10%	74%	26%	62%	38%	44%	56%	32%	68%
10	90%	10%	73%	27%	60%	40%	43%	57%	31%	69%
9	89%	11%	71%	29%	59%	41%	42%	58%	31%	69%
8	87%	13%	70%	30%	57%	43%	41%	59%	30%	70%
7	86%	14%	68%	32%	56%	44%	39%	61%	29%	71%
6	84%	16%	66%	34%	54%	46%	38%	62%	28%	72%
5	83%	17%	64%	36%	52%	48%	37%	63%	27%	73%
4	80%	20%	62%	38%	50%	50%	35%	65%	26%	74%
3	78%	22%	60%	40%	48%	52%	34%	66%	26%	74%
2	75%	25%	57%	43%	46%	54%	33%	67%	25%	75%
1	71%	29%	54%	46%	43%	57%	31%	69%	24%	76%
0	65%	35%	49%	51%	40%	60%	29%	71%	23%	77%

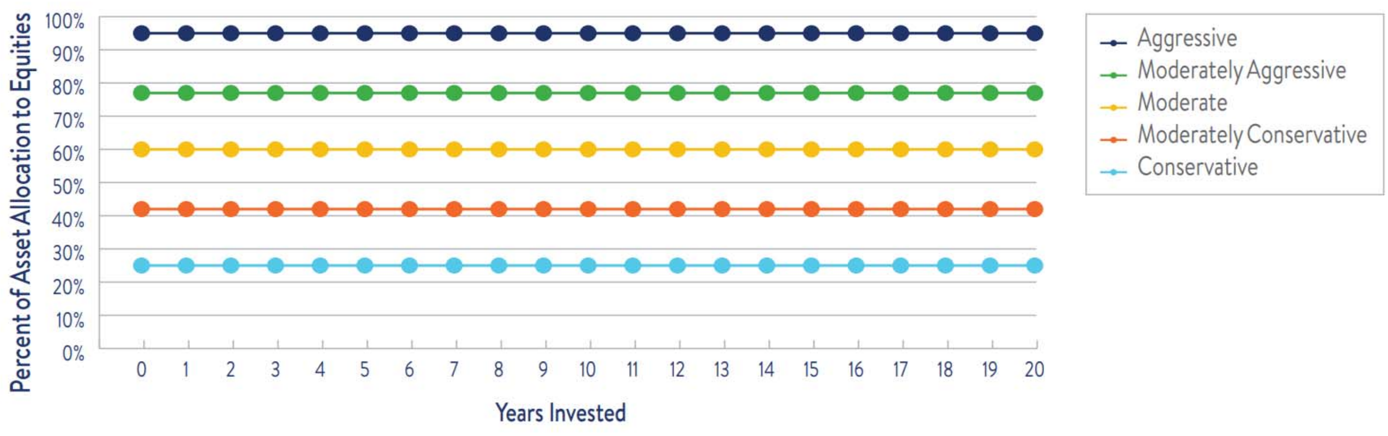
Major Purchase Glidepaths *(as of 09/22/20210)*



Years to Major Purchase Date

Years to Goal	Aggressive			Moderately Aggressive			Moderate			Moderately Conservative			Conservative		
	Equity	Fixed	Cash	Equity	Fixed	Cash	Equity	Fixed	Cash	Equity	Fixed	Cash	Equity	Fixed	Cash
18	95%	5%	-	85%	15%	-	75%	25%	-	65%	35%	-	55%	45%	-
17	88%	12%	-	79%	21%	-	70%	30%	-	61%	39%	-	52%	48%	-
16	83%	17%	-	74%	26%	-	66%	34%	-	57%	43%	-	49%	51%	-
15	78%	22%	-	69%	31%	-	61%	39%	-	53%	47%	-	45%	55%	-
14	73%	27%	-	65%	35%	-	57%	43%	-	50%	50%	-	42%	58%	-
13	69%	31%	-	61%	39%	-	54%	46%	-	47%	53%	-	39%	61%	-
12	66%	34%	-	58%	42%	-	51%	49%	-	44%	56%	-	36%	64%	-
11	63%	37%	-	55%	45%	-	48%	52%	-	42%	58%	-	34%	66%	-
10	60%	40%	-	53%	47%	-	46%	54%	-	40%	60%	-	33%	67%	-
9	58%	42%	-	51%	49%	-	45%	55%	-	39%	61%	-	32%	68%	-
8	55%	45%	-	49%	51%	-	43%	57%	-	37%	63%	-	31%	69%	-
7	53%	47%	-	48%	52%	-	42%	58%	-	37%	63%	-	31%	69%	-
6	51%	49%	-	46%	54%	-	41%	59%	-	36%	64%	-	30%	70%	-
5	48%	52%	-	43%	57%	-	38%	62%	-	33%	67%	-	29%	71%	-
4	43%	57%	-	39%	61%	-	34%	66%	-	30%	70%	-	25%	75%	-
3	37%	63%	-	33%	65%	2%	29%	62%	9%	25%	59%	16%	21%	56%	23%
2	30%	45%	25%	27%	42%	31%	24%	39%	37%	21%	37%	42%	18%	34%	48%
1	21%	20%	59%	20%	17%	63%	18%	15%	67%	21%	8%	71%	11%	13%	76%
0	0%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%	100%

General Investing Glidepaths *(as of 09/22/2021)*



Investment Objective	Equity	Fixed
Aggressive	95%	5%
Moderately Aggressive	77%	23%
Moderate	60%	40%
Moderately Conservative	42%	58%
Conservative	25%	75%

b. BlackRock Investment Models

Asset Classes *(as of 03/04/2020)*

1. US Equity Large
2. US Equity Value
3. US Equity Small
4. International Equity Total
5. International Equity Value
6. International Equity Small
7. Emerging Market Equity
8. Broad US Bonds
9. Corporate US Bonds
10. US TIPS
11. International Emerging Debt

Fund Whitelist *(as of 09/22/2021)*

The Fortuna fund "whitelist" refers to the approved-to-buy list of ETFs, which includes all funds that have been approved to be purchased for the Fortuna portfolios. Some of these whitelist funds may be primary funds, as they'll be purchased for a client first. There is a minimum holding period on newly created positions. In addition to these primary whitelist funds, Fortuna also has alternate whitelist fund choices for the portfolios. These alternate funds are used in place of the primary funds for tax-loss harvesting events. The criteria used to select the approved ETFs include:

- Low Cost

- Liquidity
- Tracking Error
- Robust Benchmark Methodology
- Brand and Pedigree
- Established Track Record

Category Asset Class	Primary	
	Ticker	Fund Description
US Equity Large	IVV	iShares Core S&P 500 ETF
US Equity Value*	IWD	iShares Russell 1000 Value ETF
US Equity Small	IJR	iShares Core S&P Small-Cap ETF
International Equity Total	IEFA	iShares Core MSCI EAFE ETF
International Equity Value**	FNDF	Schwab Fundamental Intl'l Large Company ETF
International Equity Small	SCZ	iShares MSCI EAFE Small-Cap ETF
Emerging Markets Equity	IEMG	iShares Core MSCI Emerging Markets ETF
Broad US Bonds	AGG	iShares Core U.S. Aggregate Bond ETF
Corporate US Bonds	LQD	iShares iBoxx $ Investment Grade Corp Bond ETF
US TIPS	TIP	iShares TIPS Bond ETF
International Emerging Debt	EMB	iShares J.P. Morgan USD Emerging Markets Bond ETF

Category Asset Class	Secondary	
	Ticker	Fund Description
US Equity Large	VTI	Vanguard Total Stock Market ETF
US Equity Value*	VTV	Vanguard Value ETF
US Equity Small	VB	Vanguard Small-Cap Index Fund ETF
International Equity Total	VEA	Vanguard FTSE Developed Markets ETF
International Equity Small	VSS	Vanguard FTSE All-World ex-US Small-Cap ETF
Emerging Markets Equity	SCHE	Schwab Emerging Markets Equity ETF
Broad US Bonds	BND	Vanguard Total Bond Market ETF
Corporate US Bonds	VCIT	Vanguard Intermediate-Term Corp Bond ETF
US TIPS	VTIP	Vanguard ST Inflation-Protected Securities ETF
International Emerging Debt	VWOB	Vanguard Emerging Markets Gov Bond ETF

Category Asset Class	Tertiary	
	Ticker	Fund Description
US Equity Large	SCHB	Schwab U.S. Broad Market ETF
US Equity Small	SCHA	Schwab U.S. Small-Cap ETF
International Equity Total	SCHF	Schwab International Equity ETF
International Equity Small	SCHC	Schwab Int'l Small-Cap Equity ETF
Emerging Markets Equity	VWO	Vanguard FTSE Emerging Markets ETF
Broad US Bonds	SCHZ	Schwab U.S. Aggregate Bond ETF

**As of November 2020, the ticker symbol IVE will no longer be purchased to fulfill the Domestic Value* *allocation within Fortuna models. Due to this change, IWD will become the primary ticker, and VTV will become the secondary ticker for new purchases. IVE will continue to be held in client portfolios and may be sold out of client portfolios over time as the portfolio transitions smartly and gradually to the new ETFs.*

***As of September 2021, the ticker symbol EFV will no longer be purchased to fulfill the International Equity Value allocation within Fortuna models. Due to this change, FNDF will become the primary ticker for new purchases and there will be no secondary ticker. EFV will continue to be held in client portfolios and may be sold out of client portfolios over time as the portfolio transitions smartly and gradually to the new ETFs.*

c. Investment Philosophy and Methodology

Investment Strategies

Equities, as an asset class, generally have a high probability of outperforming other broadly accessible and liquid asset classes over a 10-year period or longer. For younger clients, or clients who have longer time horizons for their investments, a larger stock allocation typically makes more sense from a risk/return standpoint.

One of the main tenets of our investment philosophy is that adjusted for fees, low-cost passive investments like index-based ETFs generally outperform higher-cost actively managed funds, which more often than not lag behind their benchmark indexes over longer periods of time due to a combination of poor active investment choices and higher fees.[1]

The Fortuna portfolio strategy has a long-term outlook and generally holds a bias toward value, small cap, and US Equity. This Fortuna investment philosophy is a rules-based approach, using algorithms to improve tax efficiency in buy/sell/hold decisions, which generally can improve after-tax returns through the reduction and deferral of taxes.

	23/77	30/70	40/60	50/50	60/40	70/30	80/20	90/10	95/05
US Equity Large	11	14.5	19	24	29	34	40	45	47
US Equity Value	2	2.5	4	4	5	5.5	6	7	7.5
US Equity Small	2.5	3.5	4.5	5.5	7	8	9	10	10.5
International Equity Total	3	4	5	6.5	7.5	8.5	9	10	11
International Equity Value	1	1.5	2	2.5	3	3.5	4	4.5	5
International Equity Small	1	1.5	2	2.5	3	3.5	4	4.5	5
Emerging Markets Equity	2.5	3	4	5	6	7	8	9	9
EQUITY TOTAL	**23**	**30**	**40**	**50**	**60**	**70**	**80**	**90**	**95**
Broad US Bonds	67	61.5	53	44	35	26	17	9	5
Corporate US Bonds	0	0	0	0	0	0	0	0	0
US TIPS	5	4.5	4	3.5	3	2.5	2	1	0
International Emerging Debt	5	4	3	2.5	2	1.5	1	0	0
FIXED INCOME TOTAL	**77**	**70**	**60**	**50**	**40**	**30**	**20**	**10**	**5**

(as of 09/22/2021)

Householding

Clients can maintain household accounts, where the total assets are managed to continually adhere to one investment objective, helping keep the investments on track to pursue the client's overall goals.

Householding is used for clients with at least two accounts and can consist of qualified and/or non-qualified accounts. Households also include accounts for individuals with a spouse or spousal equivalent who reside at the same address. Although taxable and non-taxable accounts may include different asset classes, the accounts are managed collectively toward one goal and one investment objective. As a result, the performance and returns of one spouse may be materially different from those of the other spouse.
Householding provides several benefits to clients, including tax-efficient asset placement.

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[1] Morningstar's Active/Passive Barometer, "A new yardstick for an old debate," 2015.

Investing with a spouse

If you open multiple accounts held by you and/or your spouse or spousal equivalent, we will manage these accounts collectively to one goal. Please note:

- The financial income you provide will be used to represent both of you;
- The household must have an agreed upon number of years to retirement
- All your household accounts will be managed to the same investment strategy. After we learn more about you in the next few steps we determine the household investment strategy.

If you would like to learn more about householding, please click on the FAQs for further information. You may also speak with your advisor to determine if householding is right for you.

Tax-Smart Portfolio Implementation

As a client's assets transition from their current holdings into Fortuna low-cost ETF strategy, Fortuna will perform several layers of analysis to determine the most efficient course of action for the assets. Depending on the overall tax impact to the client, Fortuna weighs whether the existing holdings should be held and holistically managed around or sold off.

Please note: Do NOT transfer any assets into Fortuna that you or the client aren't willing to sell out of completely. Fortuna's goal is to move the current cash and holdings into the low-cost ETF model. If, prior to transferring the account to Fortuna, you're aware of a position's gains and feel it will have a large impact on the client, consider selling the position ahead of time and transferring the cash into Fortuna.

Fortuna will review the following tenets before placing trades:

- High capital gains
  - Fortuna looks to minimize capital gains overall by evaluating the results of selling positions and determining the amount of gains. The cost of those gains is then compared to the value of the improvement to the portfolio. The algorithm will run until it finds an equilibrium between gains realized and portfolio improvement. It is a case-by-case basis dependent on portfolio size, risk tolerance, time horizon, account or tax efficiency, etc. Fortuna utilizes

the below criteria to prompt review by the FutureAdvisor Portfolio Review team.

- **Portfolio-Level Gains** — **Position-Level ST Gains**
- LT Gains: Max 3.5%, or $20,000 — ST gains do not exceed $200, OR
- ST Gains: Max 1.75%, or $10,000 — ST gains do not exceed 5% of the position value

- Short-term capital gains (waiting until they become long-term gains)
- Missing cost basis for a position
- Wash sale avoidance
- Eligible securities
  - Fortuna can only support cash, ETFs, stocks, and mutual funds

Fortuna analyzes long- and short-term capital gains, taking into account the time-value of the money:

- If the taxes owed from expected capital gains are greater than what the client can realistically recover in their time horizon, the positions will not be sold.
- Short- versus long-term capital gains are examined when weighing whether to sell the position. Positions with short-term capital gains will typically not be sold until the client has held the position for at least one year or until it makes sense mathematically to do so.
- In some instances, cost basis may be missing from a position. Positions lacking cost basis won't be traded to avoid an unexpected tax burden for the client.
- Fortuna will also analyze a client's holdings to avoid wash sales.

Advisors can contact Fortuna Support to request a potential sales override only in the event that the algorithm locks positions due to high capital gains. If after a client's portfolio is rebalanced and not in line with expectations, please give Fortuna Support a call. Fortuna has a minimum holding period on newly created positions. If the client would like to modify their target asset allocation shortly after the initial rebalance please contact Fortuna Support for additional information as Fortuna may attempt to limit trading frequency.

Tax-Efficient Asset Placement

Fortuna analyzes the client's portfolio for tax efficiency based on the securities held (e.g., fixed income vs. large cap growth) and the type of account(s) in which they're held (e.g., tax-advantaged (retirement) and taxable accounts). Many clients apply the same allocation in both their taxable and tax-deferred accounts, but this can cut down on post-tax returns.

Fortuna determines the percentage of the client's cumulative assets that are held in taxable accounts, deemed tax inefficient and would benefit from "tax sheltering." Fortuna will place the client's least tax-efficient funds into tax-advantaged accounts. These funds, such as Fixed Income, are those that generate the most taxable income. By placing bonds, for example, in a tax-advantaged account, the client can defer paying tax on the dividend, allowing it to be reinvested and potentially grow for years to come.

Once the tax-advantaged accounts have been filled with the appropriate investments, Fortuna will then place the tax-efficient funds into taxable accounts. Tax-efficient asset placement is a standard investment strategy for Fortuna. However, the approach to tax-efficient asset placement is unique to every client based on their asset allocation and the availability of tax-sheltered accounts within the client's portfolio.

The chart below organizes the Fortuna asset classes from most tax efficient to least tax efficient. Fortuna tries to place less tax-efficient assets in Qualified accounts and may result in accounts holding different set of securities to benefit from tax efficient asset placement.

*The order of asset classes from tax -efficient to tax-inefficient can vary. The above chart is for illustrative purposes only.

Tax-Loss Harvesting

Fortuna analyzes client accounts daily to look for tax-loss harvesting opportunities. Fortuna will tax-loss harvest portfolios when a minimum security loss of $500 and 1.5% of the position value are both present. This means that Fortuna will perform tax-loss harvesting each time the equity or bond markets pull back roughly 3% to 5%, though this range still may vary. These activities will cease once all white-listed funds have been exhausted and/or it has been less than 31 days, due to wash-sale considerations built into the algorithm.

Unlike many investment services, tax-loss harvesting is available to all clients using Fortuna, not just wealthy clients. All Fortuna portfolios with a taxable account are automatically enrolled in tax-loss harvesting. However, larger accounts will experience greater benefits. Clients who have both taxable and non-taxable Fortuna accounts especially benefit, as tax losses are harvested by the taxable account, and income-producing assets are sheltered in the tax-deferred accounts when possible.

Threshold-Based Rebalancing (Market-Movement Based Rebalancing)

Fortuna automatically rebalances client portfolios based on portfolio drift from the target allocation. Research has shown that excessive rebalancing can work against short-term momentum factors and possibly reduce returns. Fortuna may limit trading frequency due to explicit trading costs, minimizing potential short-term taxable gains, and adhering to the wash sale rule with regards to tax loss harvesting. That said, rebalancing is necessary to maintain the risk profile of the portfolio over the long term.

Depending on the size of the account, rebalancing trades occur when the relative drift from the client's target allocation is between 3% and 5%. When explaining rebalancing activities to clients, you might say that these threshold-based rebalances, often referred to as "market-movement-based rebalances," can sometimes make it appear as though Fortuna is buying stocks on weakness when markets fall and/or "taking profits" as markets rise and reallocating those profits to bonds to maintain the portfolio balance.

Corrections

Fortuna monitors your client's Fortuna managed portfolio daily, seeking out rebalancing opportunities to keep the asset allocation on track. This means it would typically take a 7% to 10% shift in the equity or bond markets for a portfolio to be rebalanced.

If for example the S&P lost 10% and the client's US Equity Large Cap ETFs fell a similar amount, the bonds used as a hedge in their portfolio would be recognized as overweight as they may have gained in this same period. So rather than go to cash and selling after a market drop(a poor approach to take), Fortuna would sell off a portion of the bonds to bring their allocation back to equilibrium. Fortuna would use the proceeds from those funds to buy more of the fallen ETFs on their weakness to bring them back to equilibrium, which would allow us to have more in those positions for a potential rebound. But the key is, this will always be done in a systematic approach and not speculative one.

Bear Markets

A 7%-10% market drop will trigger rebalancing in many clients' portfolios. However, some accounts, especially smaller accounts, won't be rebalanced until a 12% or larger drop. Smaller accounts usually need larger market movements for a rebalance to makes sense. In a bear market, every additional 7%-10% drop will trigger the same kind of rebalance until we reach the bottom of the market.

Risk Management Strategies

- Obtaining international diversification through low-cost ETFs to lower volatility
- Using fixed-income assets to hedge against equity downturns

d. Performance

Fortuna Historical Performance information is available in a separate document named 'Fortuna Historical Model Performance', which provides historical performance on several BlackRock models that are representative of the BlackRock models in Fortuna. This document can be found on your Fortuna FieldNet page.

e. Commonly Asked Investment Methodology Questions

Question: Can a client or advisor adjust the allocation?

Answer: No. Advisors do not have the ability to adjust the allocation. Clients can adjust their years to retirement (time horizon) in their profile or edit their responses to the risk tolerance question s to arrive at a more conservative or more aggressive model portfolio asset allocation, but the percentage allocations of each model portfolio component are fixed ratios and can't be adjusted individually.

Question: Can clients lock stocks in the Fortuna portfolio?

Answer: Yes. Clients can "lock" up to 10% of their portfolio with individual stock holdings they'd like to keep. Locking a position may cause market, concentration and issuer risk associated with holding a single security. This risk may increase as the size of the locked position grows. Some positions may be temporarily held due to high capital gains taxes, but most positions will be immediately sold, so that the ETFs used in the Fortuna portfolios can be purchased and implemented into the portfolio model.

Question: Can clients dictate specific buys, sells, or holds in the Fortuna portfolio?

Answer: No. Clients cannot direct trading in the Fortuna portfolio. If they wish to direct trading, they'd need to open a personal trading account outside of the Fortuna platform.

Question: Does the algorithm look for opportunities to rebalance the client's portfolio?

Answer: Yes. The algorithm looks for opportunities daily and throughout the year to rebalance the portfolio to keep it in line with the target allocation.

Question: Is tax-loss harvesting applicable to tax-deferred and/or tax-advantaged accounts?

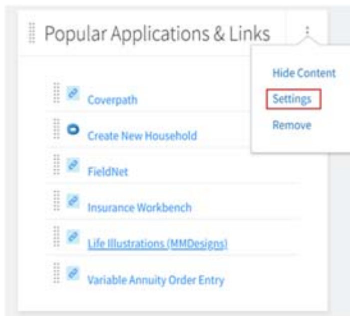
Answer: No. Only taxable accounts benefit from tax-loss harvesting.

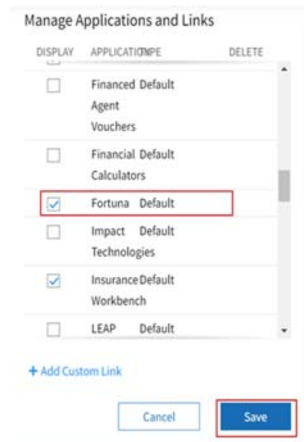
Fortuna – Advisor Dashboard

a. Advisor Dashboard Landing Page

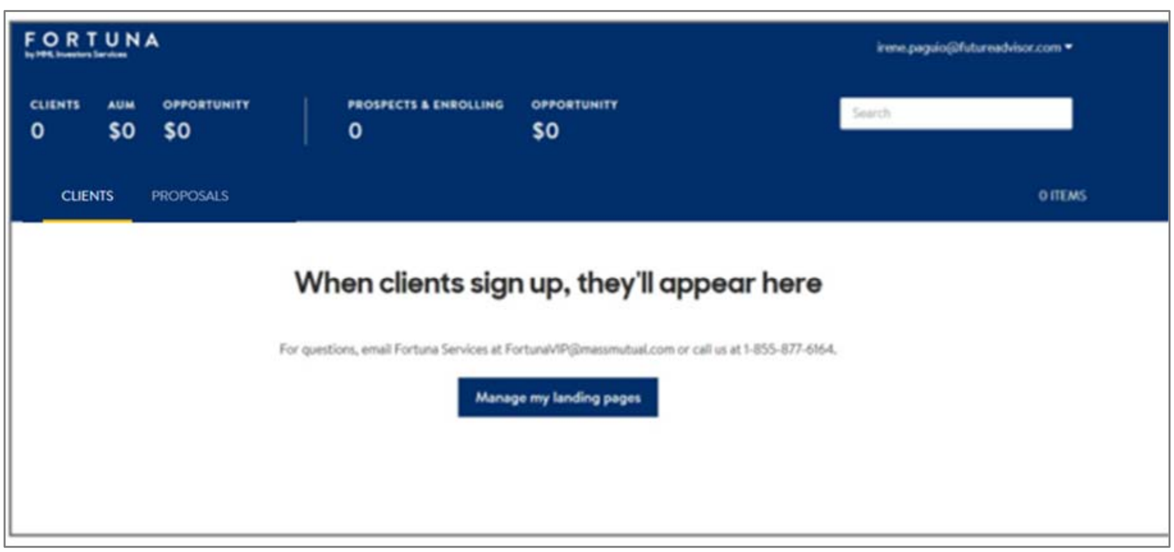
To access your Fortuna Advisor Dashboard log into the A360 Dashboard:

- On your Okta landing page click on the A360 tile
- On your A360 dashboard, locate the **Popular Applications & Links** Widget and click on **Fortuna**
    - If you do not see the **Popular Applications & Links** widget, select +**Add Widgets** on the top right of the dashboard. Once located, simply drag the widget to the dashboard
    - On the **Popular Applications & Links** widget, click on the 3 dots and select **Settings**
    - Scroll down to locate Fortuna in the list and check off the Display box and click **Save**

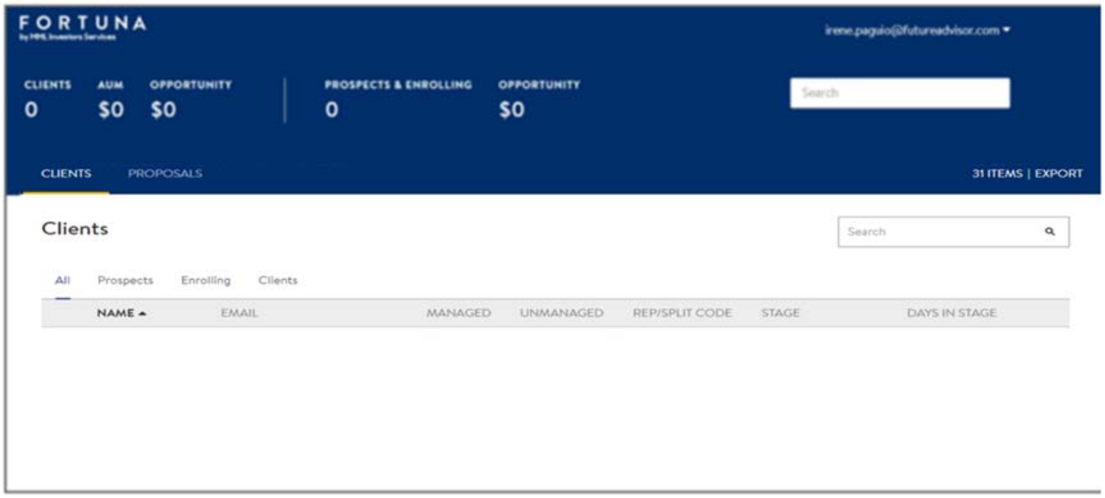




You will see your home page with access to your clients:

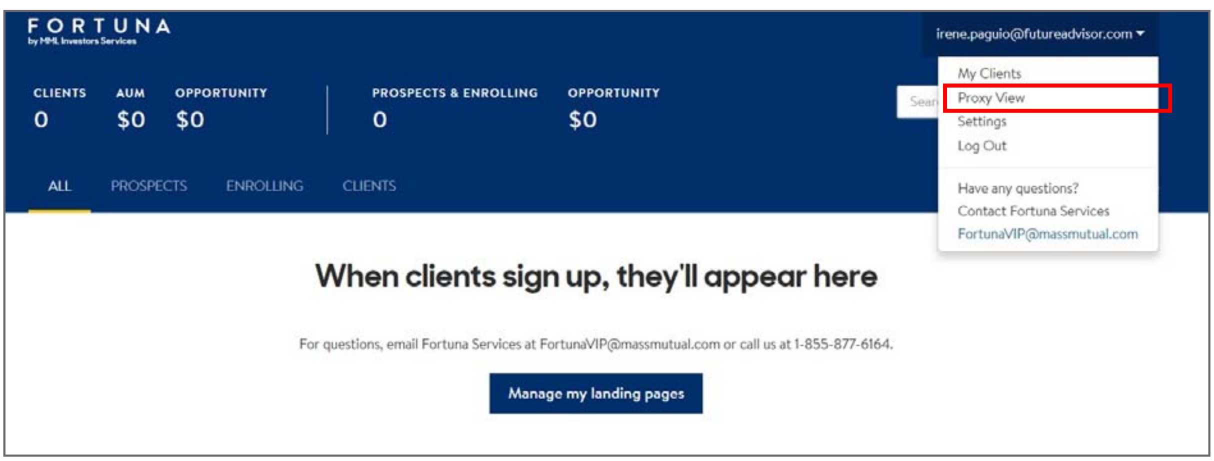


In the Clients tab, you can view clients with managed goals:



Proxy Access

Beyond seeing your own clients, there is a view-only option known as Proxy View that allows you to see details in the Advisor Dashboard of clients who aren't under your rep ID. You'll automatically be able to view the Advisor Dashboard of other advisors in your office whose information you can currently view in Wealthscape. For those with Proxy View, you would enter the Fortuna Advisor Dashboard through your Okta landing page and clicking on the Fortuna Okta tile. You can also go to the FieldNet Fortuna Landing Page and click on the "Access Fortuna" tile. To grant proxy access to your Rep ID, fill out the Proxy Form for Wealthscape on Fieldnet.



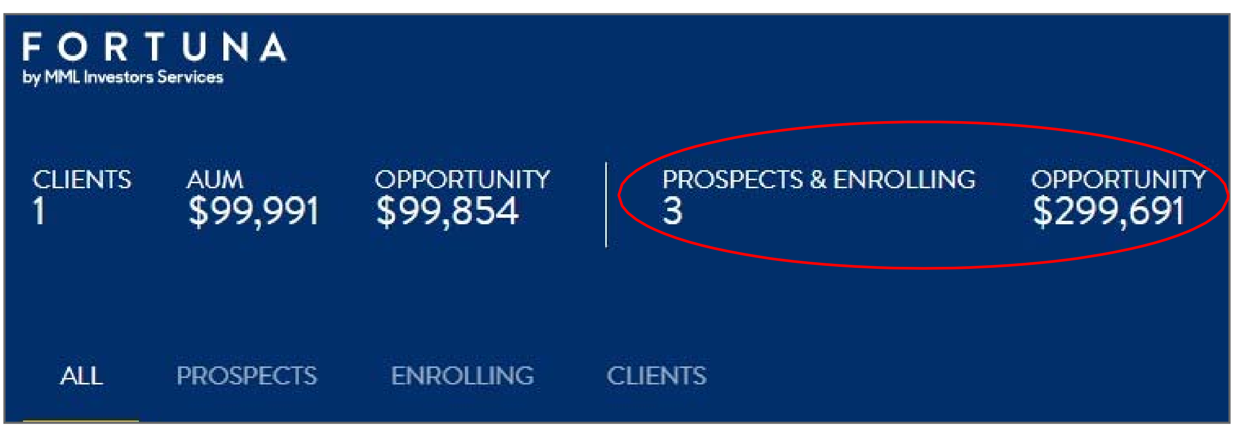
Fortuna Client Information Bar

When you enter the Advisor Dashboard, you'll see the client information bar at the very top. This bar shows data on your Fortuna managed clients. Below the bar, you'll see sortable information for all clients.

On the left side of the client information bar, you'll see your total number of Fortuna managed clients, AUM (total Fortuna managed assets), and an "Opportunity" amount. The "Opportunity" amount represents the assets your existing clients have linked on the Fortuna platform that aren't managed through Fortuna.

- Clients - number of Fortuna managed clients
- AUM - assets directly managed
- Opportunity - linked assets, not managed within a Fortuna account

On the right side of the bar, you'll see a spot for individuals who are either still prospects or currently in the process of enrolling. This section should be blank as these individuals have been deleted from the system as of November 3, 2021.



- Prospects & Enrolling - this should be blank
- Opportunity - this should be blank

Client Search Tool

Use the Search bar to find a client by their email address, which will take you directly to their profile. You can also search by client name.

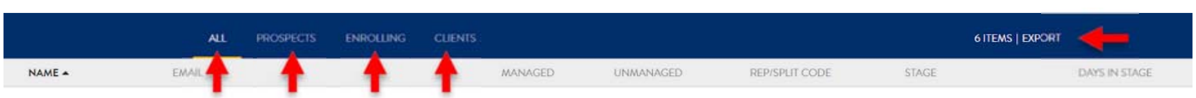
Note: If you do a partial search such as "Andy," it will populate a list of every prospect or client in the system with the first or last name of Andy.

Clients Tab

On the bottom of the client information bar, you have a clients tab. Use the clients tab to view all clients in different stages.

Clients tab - Sortable Lists

Within the clients tab, you have the ability to filter the information shown on the populated list below the bar. The list defaults to showing all accounts in the system, but you can select the filters to only view all prospects, all enrolling clients, or all Fortuna managed clients. You can also export the list as an Excel file.



Click on the header to sort the information by alphabetical/numerical order. Click on it again to sort the column by reverse alphabetical/numerical order.

Prospects

This tab should be empty.

Enrolling

This tab should be empty.

Clients

Clients are clients who've completed all the account opening paperwork and have assets managed through Fortuna.

Sorting the unmanaged column by value allows you to see clients who have the highest amount of linked assets not yet managed.

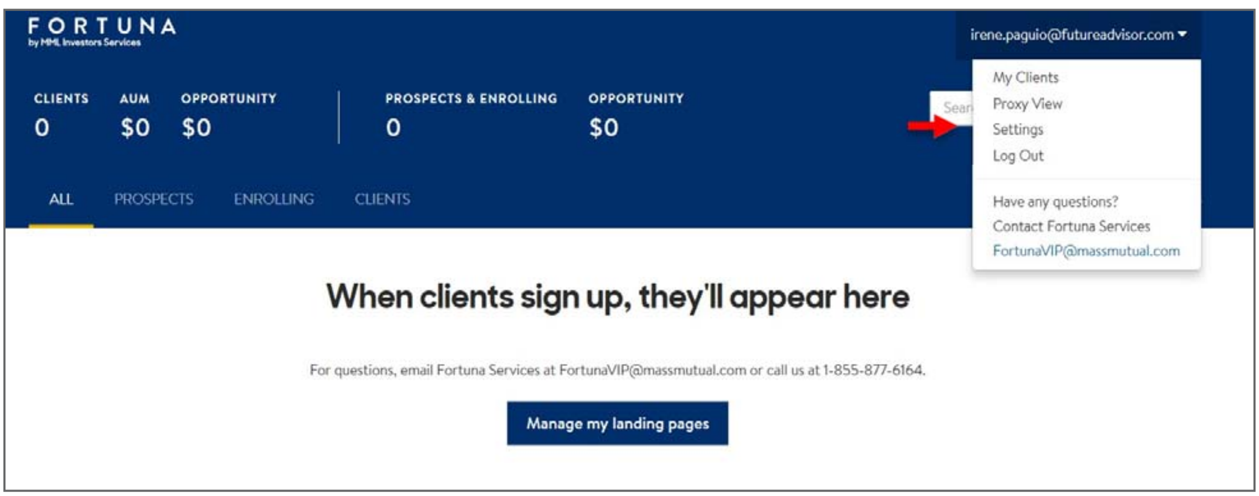
MANAGED	UNMANAGED
$85,000.00	$99,854.00
$85,000.00	$99,982.75
$99,990.75	$99,854.00
$0.00	$99,854.00

Excel Export

To export the information displayed on your current tab (all/prospects/enrolling/clients) into Excel, click on the "Export" button on the top right of the Advisor Dashboard.

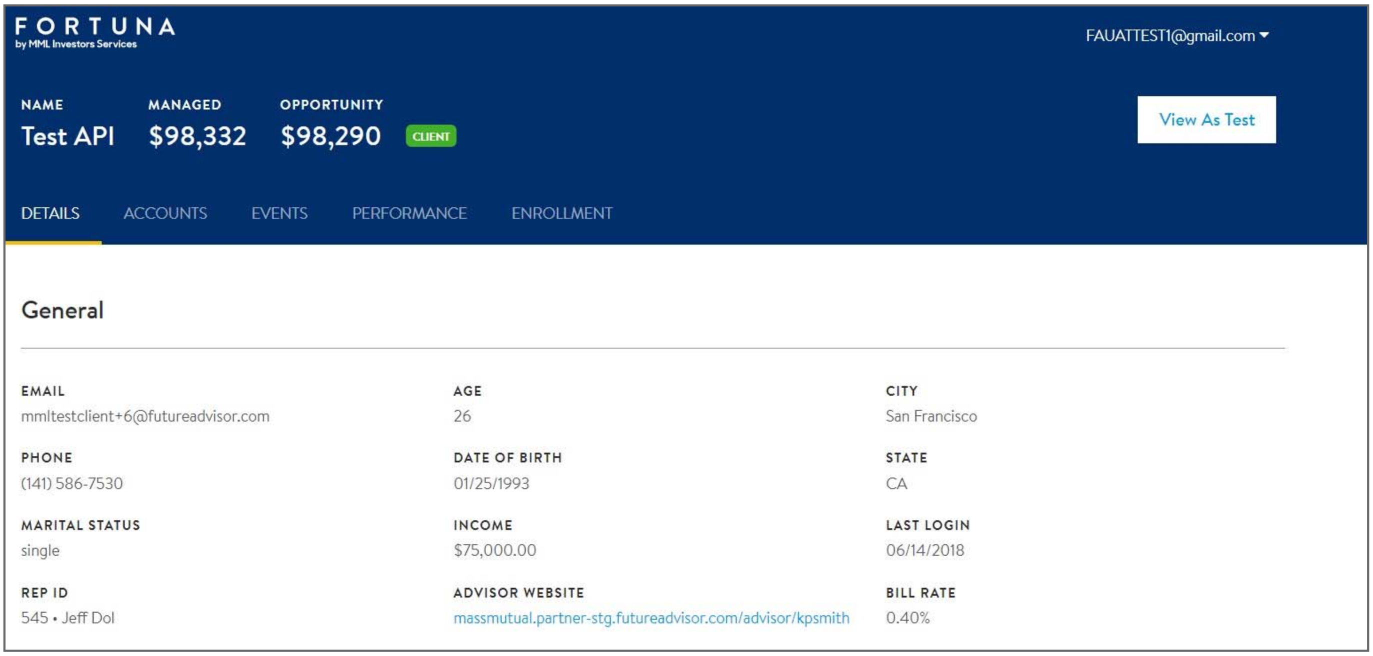
Updating Your Advisor Information – Manage your Rep IDs

You can access all the information related to your Fortuna URLs and other Fortuna details such as management fee and Form ADV 2B in the "Settings" section under your email dropdown. You can edit the information as necessary and allowed and upload updated Form ADV 2B documents.



b. Client Details

After searching for the specific client, click on the name to get to their profile. This will take you into the advisor view for the individual client, where you'll be able to see all of the client's important information in once place.



The upper section of the page provides important, basic information and allows you to navigate the page.

On this page you'll see the client's name, managed assets (AUM), and opportunity assets (not managed through Fortuna). Below are five tabs that allow you to toggle between different views to see more information about the client:

- Details
- Accounts
- Events
- Performance
- Enrollment

Details Tab

The Details tab is broken up into four sections:

- General
- Goal
- Email Preferences
- Submit Requested Documents

General Information

The General section shows you contact information, such as email and phone number, and important dates, such as when the account was created, when the client first became a Fortuna managed client, and when they last logged in, as well as other important details about their account.

Both the Fortuna platform fee and advisor fee are billed together, in advance, on a quarterly basis at the end of each calendar quarter based on the client's Fortuna managed AUM as of the last day of the previous quarter. Your client's first bill will also include a prorated amount to cover the time since they began management with Fortuna. Fortuna automatically deducts these fees and does so from non -tax sheltered accounts when possible.

General

EMAIL mmltestclient+6@futureadvisor.com	AGE 26	CITY San Francisco
PHONE (141) 586-7530	DATE OF BIRTH 01/25/1993	STATE CA
MARITAL STATUS single	INCOME $75,000.00	LAST LOGIN 06/14/2018
REP ID 545 • Jeff Dol	ADVISOR WEBSITE massmutual.partner-stg.futureadvisor.com/advisor/kpsmith	BILL RATE 0.40%

Goals

Your goal details will be show in this section. Information will include the stage, initial signup date, risk tolerance, days in current stage, managed inception date, and retirement age.

Retirement goal (My Retirement)
Goal ID 14004

STAGE Ongoing Maintenance	SIGNUP DATE 01/25/2018	RISK TOLERANCE Moderate
DAYS IN STAGE 417	MANAGED GOAL SINCE - -	RETIREMENT AGE 65

Clicking on their risk tolerance, brings up the client's responses to the initial investment profile questionnaire from the signup process.

Email Preferences

This section allows you to see which emails the client receives. The client can change their email address by contacting Fortuna Support at FortunaVIP@massmutual.com or (855) 877-6164.

Email Preference

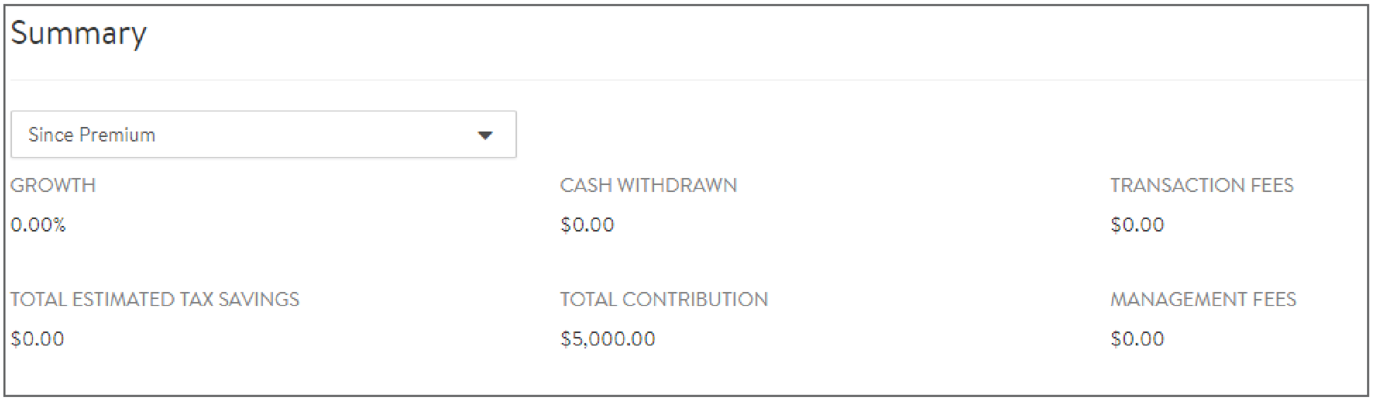
RECEIVES	DOES NOT RECEIVE
Advice and Portfolio Summaries	

Performance Tab

In the performance tab, you have access to the client's portfolio time-weighted return. The time-weighted return measures client account's growth rate over a specific period. This method excludes deposits and withdrawals for a clearer view of performance.

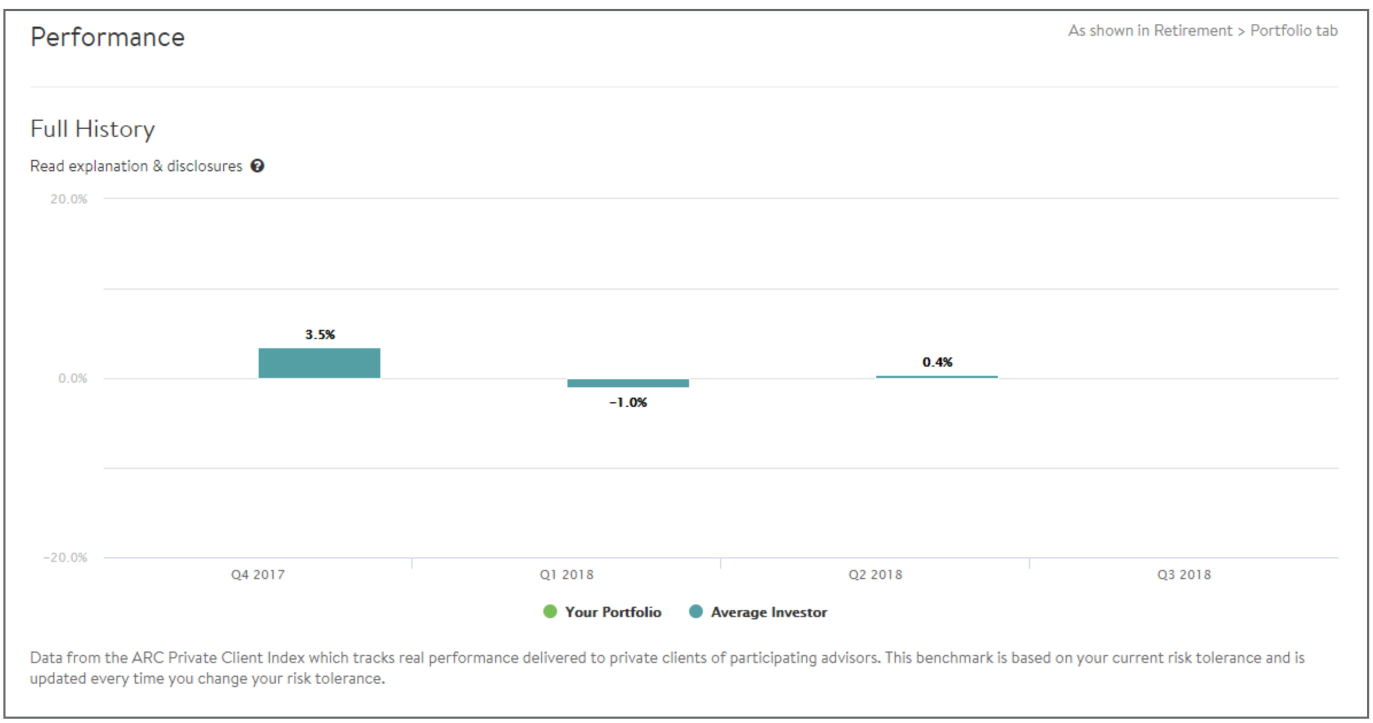
Summary of Client Performance

In this section, you can see the client's account performance in percentage terms, the estimated amount of taxes they've had tax-loss harvested, their contributions/withdrawals, and any fees they may have incurred. You can change the performance date range by clicking on the dropdown menu.



Full History of Client Performance

The performance in this section is based on the portfolio's overall performance since the client became a Fortuna customer.

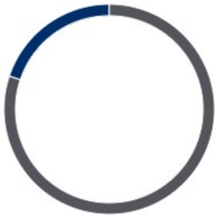


Asset Allocation of Client Portfolio

The asset allocation section allows you to view the client's current stock/bond/other split (Your Portfolio), as well as our suggested split for them (Recommended for You). You can also see their existing and suggested allocations broken down by asset class ("You" and "Recommended").

"Your Portfolio" and "Recommended For You" charts will look very similar for your Fortuna managed clients.

Asset Allocation



Last updated 07/20/2018

ASSET CLASS	TARGET	CURRENT
Other	0.0%	80.1%
Equities	75.0%	19.9%
Fixed Income	25.0%	0.0%

Events Tab

In the Events section, you can view all important events that have taken place in the client's account. This includes rebalancing events; tax-loss harvesting events; management fee deductions; automated email events, such as milestones; and manual changes, such as when a client changes their risk tolerance or retirement age/years to invest.

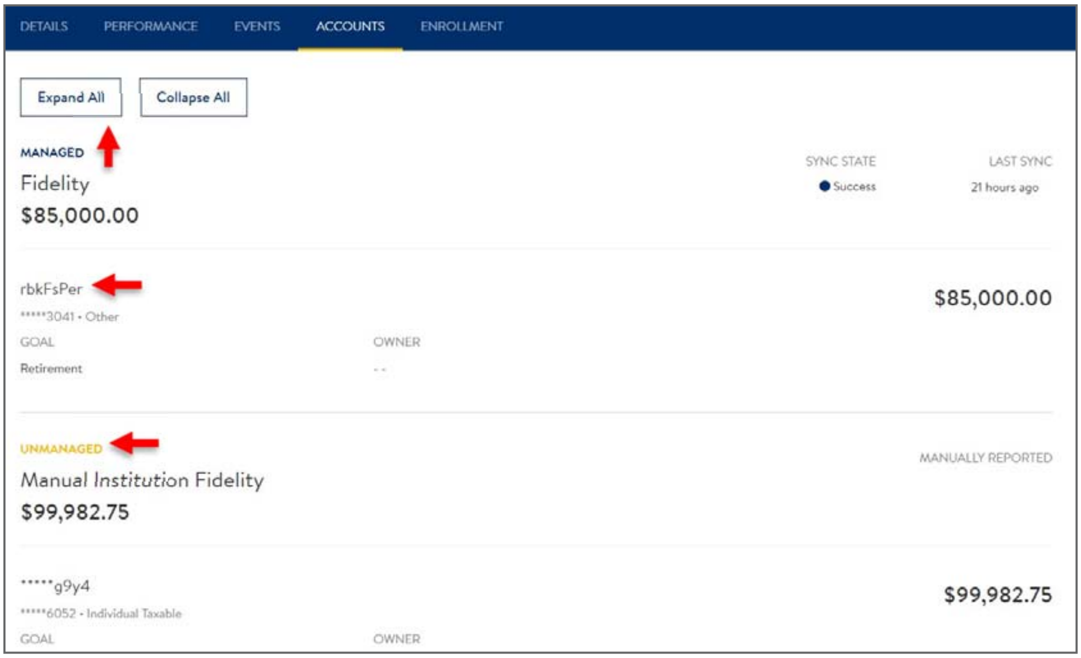
DETAILS PERFORMANCE EVENTS ACCOUNTS ENROLLMENT

DATE ▾	EVENT	DESCRIPTION	GOAL
04/20/2018	Milestone met	- -	Retirement
03/30/2018	Rebalance Needed	- -	Retirement
01/25/2018	Fully Enrolled for My Retirement	- -	Retirement
01/25/2018	New cash received	- -	Retirement
01/25/2018	New Dividend Received	- -	Retirement
01/25/2018	Enrollment Complete	- -	Retirement
01/25/2018	Fully Enrolled for My Retirement	- -	Retirement

Accounts Tab

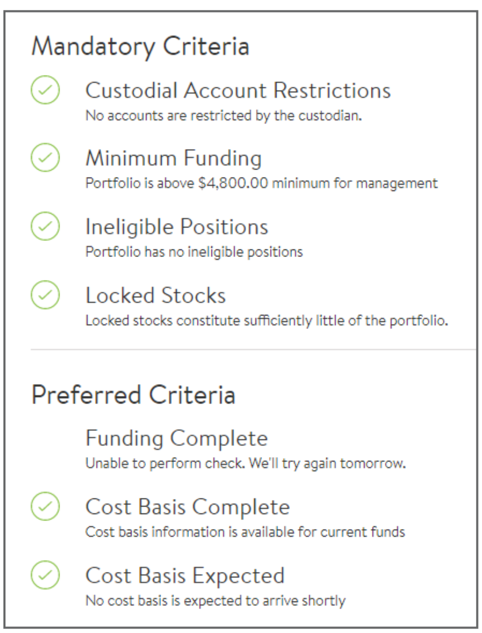
The accounts section allows you to view all the accounts a client has linked in the Fortuna platform. The linked accounts are separated by managed accounts (assets currently managed through Fortuna) and unmanaged accounts (those still in other accounts not managed by Fortuna).

You can view all the positions in any single account by clicking on the account number. Or, you can look at the positions in all of the accounts at once by clicking on the "Expand All" button. You will also be able to see any locked positions the client has elected.



Enrollment Tab

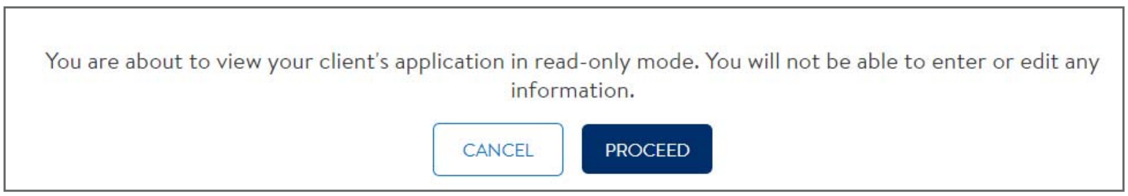
The enrollment tab will appear while a prospect is in the process of enrolling for a Fortuna account and before the trades have settled in the account. You'll see which steps in enrollment your client has completed, and which are still incomplete. This tab will give you the information you need to determine which stage of the process your clients are in.



c. View As Client Tool

Clicking on the "View As Client" button will provide you with a read only view of the Client Dashboard, show in g you what they see and giving you access to the same information they have. You will not have the ability to change any information on behalf of the client.

This is an excellent tool for helping clients understand what's going on in their account, if necessary.



d. How to use the Advisor Dashboard Information

There are many approaches to utilizing the information in the Advisor Dashboard, below are a few key ways:

Finding Opportunities

You'll be able to look at the unmanaged, linked assets for each client. You may find opportunities where clients might be suited for other products or services you offer.

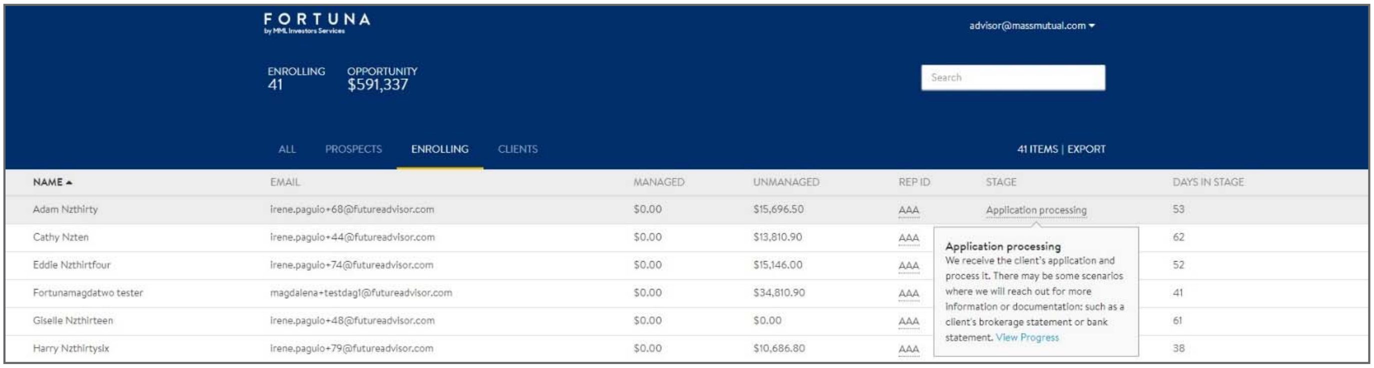
If you plan on eventually transitioning Fortuna clients to your full-service model, you can use the information to decide when to broach the discussion with them (i.e., when they reach a certain asset mark).

Performing Ongoing or Annual Reviews

You can use the individual's profile information in your Advisor Dashboard to determine if any risk tolerance changes are appropriate. In addition, if during the annual review process, the annual review email bounces back to FutureAdvisor due to an invalid email address, you'll need to contact the client using another communication method. You can use their information within the Advisor Dashboard to find other ways to potentially get in touch with them.

e. Understanding Fortuna Account Stages

Below is a breakdown of the various mouse-over descriptions for each Fortuna client stage. You can look at a client and see where they are in the enrollment process as they become a Fortuna managed client in your Fortuna Advisory business.



Stage	Client's FORTUNA Status	Description
Accounts Opened	**Enrolling**	Fortuna opened your client's account and will initiate transfers from outside financial institutions.
Accounts Funded	**Enrolling**	Fortuna received assets. The account is now ready for the final review before trading.
Initial Rebalancing	**Enrolling**	Fortuna reviewed the account. Trading will begin, and Fortuna will move your client into their recommended portfolio.
Managed	**Managed**	As a Fortuna managed client, they're invested in their recommended portfolio and will continue to receive automated management.
Canceled	**Canceled**	Either your prospect was unresponsive during enrollment or your client asked to cancel management.

Fortuna – Client Operations

a. Who to Contact

Client servicing, and advisor support are handled by the Fortuna Support team. Fortuna Support is a dedicated, service team through MMLIS available for you and your clients. They work directly with you and your clients to resolve issues for Fortuna managed accounts.

- Email: FortunaVIP@massmutual.com
- Phone: 855-877-6164

Customer Identification Protocol (CIP)

All CIP is satisfied through non-documentary means of identity validation. Client identity is also initially validated through the Knowledge-Based Authentication process in DocuSign. Due to these layers of identity validation methods, you aren't required to validate a government-issued client identification card as part of the application process. If needed, Fortuna Support will follow up directly with the client to retrieve it.

Not-in-Good-Order (NIGO) and CIP Alerts

In the event of funding NIGO's or CIP alerts, the Fortuna Support team will reach out to you and/or your client to resolve issues.

b. Eligible securities to transfer into Fortuna

The only positions that are eligible to transfer into Fortuna in-kind fall into the following categories:

- Mutual funds (excluding C-shares)
- U.S. exchange-traded funds
- U.S. exchange-traded equities

As a result, any security type not on this list, including but not limited to: Non-Traded REITS, Non-Traded BDCs, Fixed Income, Annuities, traded CDs, funds/equities traded on non-U.S. exchanges, C-shares, and affiliated funds would not be eligible for transfer. Contact Fortuna Support if you have any other questions regarding eligible securities.

Please note: 12b-1 fees are credited back to the end customer when mutual funds are transferred into the account. The prefix (F8T) has been coded to rebate the fees and align with the current settings for WMS.

c. Regulation Best Interest

The Securities and Exchange Commission (SEC) voted to finalize the Regulation Best Interest Rule, which elevates the standard of care to Best interest for securities, which went into effect as of 6/30/2020. This elevated standard of care refers to broker dealer business. Advisory business, such as Fortuna, is still subject to a fiduciary standard. As a dual registrant, MMLIS and its' representatives need to make sure the account type recommendations (e.g. brokerage vs. advisory) are in a client's best interest.

Due to this, new form requirements are required for Fortuna for MML to conduct proper Best Interest Reviews for Fortuna subsequent transactions. The most up to date requirements can be found in the Regulation Best Interest New Business and Subsequent Transactions Reference Sheet.

Please note: Fee Forgiveness is not available on Fortuna accounts. Fortuna will not allow transfer of assets where commissions, other sales charge, mark-up or mark down have been paid to an IA-Rep and/or MMLIS with the exception of:

- A-share mutual funds where the client did not pay a sales charge within the last 2 years/24 months.
- Mutual funds where the client did not pay a contingent deferred sales charge (CDSC) to liquidate assets within the last 2 years/24 months
- Trail based compensation
- C-Share Mutual Funds, Individual Stocks and ETFs where the client did not pay a commission, other sales charge, mark-up or mark-down in the past 13 months.
- Matured UIT
- RIA to RIA asset transitions (excludes Brinker Capital)

For more information on Regulation Best Interest, visit the Fieldnet page FieldNet/MyPractice/Regulations/Reg Best Interest (SEC Regulation Best Interest).

d. Locked individual equity positions

Clients can request to lock up to 10% of the AUM of their Fortuna account in individual equity positions. Once locked, the position will be noted in the "Accounts" tab of the Advisor Dashboard as shown below.

e. Account changes

Address updates

Clients and advisors can make address updates on Investor 360 and Advisor 360. If they want to have Fortuna Support make the change, here is what is required:

Requirements for Updates to be made by Fortuna Support	
Account Updates	**Requirements**

Client Profile Information ☐ Phone numbers ☐ Mailing and legal address ☐ Tax bracket ☐ FINRA affiliation ☐ Marital status ☐ # of dependents **Suitability Information** ☐ Annual expenses ☐ Assets held away ☐ Estimated net worth ☐ General investment knowledge ☐ Investable liquid assets ☐ Investment time horizon ☐ Investment objectives ☐ Investment product knowledge	☐ Email request – must be from email address of record ☐ Phone request – must verify identity **Note:** Upon request, Fortuna Support will send a DocuSign package using the Account Profile Changes Verification template to the client's email address of record.

Beneficiaries

Beneficiaries can be set up by utilizing the current MMLIS process. Clients can update beneficiary information at any time by contacting Fortuna Support. When the client contacts Fortuna Support to make updates to their beneficiaries, Fortuna Support will send them a DocuSign package to sign a new Beneficiary form.

f. Contributions and Withdrawals

Recurring Deposits

Recurring deposits can be completed by following the current MMLIS process. Once completed, you can submit through normal MMLIS process for it to be established on the client's account. This form can only be used to deposit cash. Any forms requesting that it be invested into specific funds will be rejected. There is a $10/month minimum requirement to set up a recurring deposit.

Deposit Cash

Deposits can be completed by following the current MMLIS process.

Client Initiated – Cash Withdrawals

- After logging into the Client Dashboard, client's click on "Withdraw cash" icon.
- They will be prompted to select the Fortuna account to withdraw money from, enter the bank account information to deposit to such as account type, account owner, routing number, and account number, the amount to withdraw, a withholding rate (if applicable), and a reason for withdrawal.
- Once they click on "Review withdrawal" and proceed to "Submit withdrawal," they will be taken to DocuSign to confirm their identity, upload a voided check or bank statement, and sign paperwork.

After setting up the required bank account information, Fortuna will save the bank account information in the Client Dashboard for future withdrawal requests.

g. Terminations

Client-Driven

Fortuna does not provide clients with the ability to request a cancellation of Fortuna management through their Client Dashboard. Clients who wish to cancel management must do so by contacting Fortuna Support to submit the request. Once Fortuna Support receives the client request, the account will be removed from Fortuna management and the client will have control of account and existing holdings.

- If Client terminates his or her account prior to the first Advisory Fee Payment Date, the account's termination date will be deemed a Payment Date and a pro-rated Advisory Fee will be due and payable for the initial quarter based on the period beginning on the first Advisory Account trade date and ending on the Advisory Account termination date, and Client's opening Advisory Account balance.
- If a client terminates his or her account after the first Advisory Fee Payment Date, the final quarter Advisory Fee will be pro-rated based on the end of the month in which the date of Service termination to the Client occurs (i.e., the Advisory Account termination date), with any excess fee rebated to Client.
- Clients who terminate their Fortuna account will be assessed a $125 NFS Liquidation/Termination fee

Firm-Driven

MMLIS may terminate a Fortuna account for certain reasons, including, but not limited to:

- Client no longer meets the minimum acceptable value of $5,000 to have an active portfolio. Fortuna Support will ask the client to deposit funds or will need to remove the account from management. There will be notifications to both the advisor and the client if this happens.
- Client has been flagged in the various surveillance/compliance systems
  - Persons of Interest
  - Negative News
  - Anti-Money Laundering
  - Etc.

h. Funding Timelines

Process Timeframes

Processing timeframes for subsequent transactions into Fortuna accounts follows the same processing time as other MMLIS accounts.

i. Handling Funds at the Primary OSJ

Payments for an asset management account or a money manager referral account business are processed by the CRIA Operations or Securities Brokerage Treasury Department via imaging. Checks are held and secured in the mailroom for direct CRIA business, and at Treasury for CRIA business on the NFS Platform. Payments must be sent (along with applicable documentation) to the appropriate program sponsor (or their designated clearing firm) promptly. The Mail Services Team shall properly secure any payments that are not forwarded on the day of receipt for processing on the next business day.

Fortuna – Client Emails

a. Fortuna Managed Service Emails

Once clients become Fortuna managed clients, they begin receiving emails updating them on their accounts and progress:

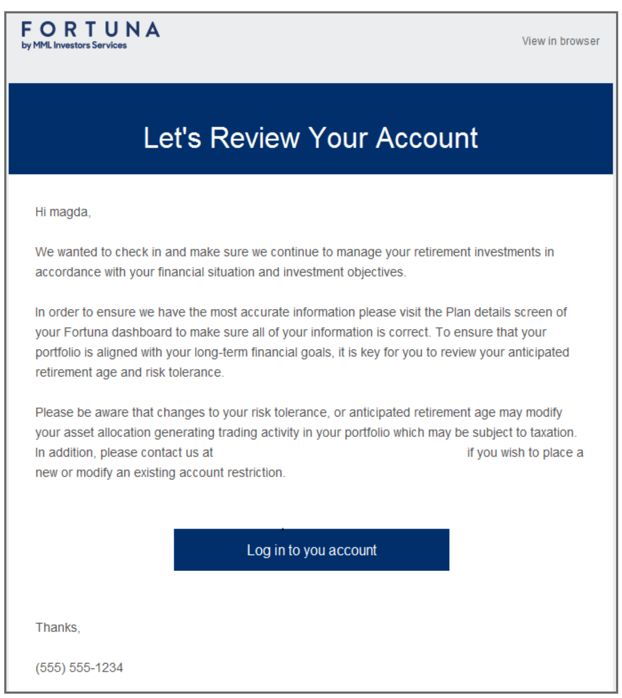
- Time-based emails:
  - Weekly portfolio and market summaries
  - Monthly portfolio summary
  - Annual client contact email

- Portfolio action emails
  - Tax Loss Harvesting complete
  - Rebalance Complete
  - Cash Invested
  - Dividends received

- Client / Account action emails:
  - Deposit Confirmation
  - Deposit Complete
  - Withdrawal Confirmation
  - Cash Available to Withdraw
  - Managed Transfer Initiated
  - Managed Transfer Complete

Annual client contact process

Each year, the annual client contact is automatically conducted via email. In addition, based on your service model as IAR, you may also choose to reach out to clients on your own. This reach out can be a great w ay to personalize a client's Fortuna experience with you, and it gives you an opportunity to see I they may want to expand their relationship with you.



Ninety (90) days prior to the account's annual anniversary, your clients will receive an annual client contact notice automatically letting them know it's time for an account review. The account anniversary is based on the day the initial rebalance of the portfolio was complete. This account review includes a link that directs the client to their Fortuna portfolio for review. If the email is successfully delivered (a bounce-back generally means the email address is no longer valid or used), negative consent will apply, and the annual contact will be considered complete. No further action on your part is required for annual suitability or annual contact, unless the client reaches out to you requesting an additional review. In cases like these, Advisors must fulfil their fiduciary obligations with their clients and document such discussions accordingly.

If Fortuna receives a bounce-back notice when attempting to deliver the annual review email, Fortuna Support will let you know the client's email address is no longer valid, and you'll need to obtain an updated address from your client. If you or the Fortuna Support team is not able to obtain the correct email address for your client, then you will receive an annual suitability email bounce-back notice that will be sent to you at the 60-day and 30-day marks prior to your client's account anniversary. Fortuna will continue to notify you if bounce-backs occur on subsequent email attempts. If there is no further bounce-back, the annual client contact requirement is fulfilled, i.e., if the email address is updated with a valid email address in time for the 60-day and/or 30-day notice, and the email(s) is delivered successfully, the account review is considered complete. If Fortuna is unable to deliver the email after all of the above steps, the Annual Contact will be considered incomplete, and Fortuna Support will restrict the client's account until their email is updated.

Fortuna - References

a. Resources available

Please find a list of reference materials available below. There w ill be updates made so please check FieldNet for the most recent materials.

FieldNet Page: Path: Products | MMLIS | CRIA | Fortuna

Compliance Manuals

Advisor FAQs