

# **WINTRUST BANKS SWEEP™ PROGRAM**

OFFERED THROUGH LPL FINANCIAL

## **DISCLOSURE BOOKLET**

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## **TABLE OF CONTENTS**

<b>BASICS OF THE PROGRAM</b> .....	<b>1</b>
<b>WHAT INVESTMENT ACCOUNTS ARE ELIGIBLE?</b> .....	<b>2</b>
<b>WHAT IS DEPOSIT INSURANCE?</b> .....	<b>2</b>
PASS-THROUGH COVERAGE .....	2
MONITORING DEPOSIT INSURANCE COVERAGE.....	3
IF A BANK FAILS AND DEPOSIT INSURANCE IS PAYABLE .....	4
FDIC INSURANCE: DETAILS AND EXAMPLES OF FDIC-DEFINED OWNERSHIP CATEGORIES .....	4
<b>NON-RETIREMENT ACCOUNTS</b> .....	<b>4</b>
<b>BUSINESS ACCOUNTS</b> .....	<b>6</b>
<b>RETIREMENT ACCOUNTS</b> .....	<b>6</b>
WHEN ACCOUNTS TRANSFER OWNERSHIP .....	7
BALANCE TRANSFERS PURSUANT TO THE WBS PROGRAM .....	7
<b>WHAT ARE THE ANTICIPATED INTEREST RATES, FEES, AND RELATED CONFLICTS OF INTEREST?</b> .....	<b>7</b>
INTEREST RATES AND HOUSEHOLD BALANCE CALCULATIONS .....	7
FEES AND RELATED CONFLICTS OF INTEREST.....	8
<b>WHAT HAPPENS WHEN THERE IS INSUFFICIENT BANK DEPOSIT CAPACITY?</b> .....	<b>8</b>
EXCESS BANKS .....	8
<b>WHAT ARE THE AVAILABLE ALTERNATIVES?</b> .....	<b>9</b>
FREE CREDIT BALANCES .....	9
MONEY MARKET MUTUAL FUNDS (MMF).....	9
SIPC COVERAGE.....	9
<b>WHERE TO FIND MORE INFORMATION ON THE PROGRAM TODAY AND IN THE FUTURE?</b> .....	<b>10</b>
<b>APPENDIX 1</b> .....	<b>10</b>
ACCOUNT OPENING AND MANAGEMENT: OPERATIONAL DETAILS.....	10
TAXES.....	11
<b>APPENDIX 2</b> .....	<b>12</b>
WBS PROGRAM AVAILABLE BANK LIST .....	12

## BASICS OF THE PROGRAM

Welcome to the Wintrust Banks Sweep™ (“WBS”) program offered through LPL Financial (“LPL”). Under the WBS program, LPL, acting as your agent, will automatically transfer (or “sweep”) available credit balances in your eligible accounts—including proceeds of securities transactions, dividend and interest payments, cash deposits, and other funds—into interest-bearing deposit accounts (“Deposit Accounts”). The Deposit Accounts will be held by insured depository institutions (“Banks”) on the WBS Program Available Bank List (“ABL”) and eligible for Federal Deposit Insurance Corporation (the “FDIC”) deposit insurance on a pass-through basis up to the applicable limits. A description of pass-through coverage is included under the heading “What Is Deposit Insurance?: Pass-Through Coverage.”

The Banks are subsidiaries of Wintrust Financial Corporation (“Wintrust”) identified on the ABL (attached as Appendix 2), subject to Bank deposit capacity as described below. Such Banks are the only depository institutions available to hold deposits under the WBS program. If you determine not to participate in, or subsequently withdraw from, the WBS program, LPL will withdraw any funds held on your behalf from the Banks, and any funds in your eligible accounts will be subject to your direction. (See “What are the Available Alternatives?” for further details.) For explicit details on the sweep process, please review “Account Opening and Management: Operational Details,” set forth in Appendix 1.

Each Deposit Account constitutes a direct obligation of the relevant Bank and is not a direct or indirect obligation of LPL. You may obtain publicly available financial information (including the most recent Reports of Condition and Income (*i.e.*, a bank balance sheet and income statement)) and concerning each Bank at [www.ffiec.gov/nicpubweb/nicweb/nichome.aspx](http://www.ffiec.gov/nicpubweb/nicweb/nichome.aspx) or by contacting the FDIC Public Information Center (i) by mail at 3501 North Fairfax Drive, Room E-1005, Arlington, VA 22226; (ii) by email at [publicinfo@fdic.gov](mailto:publicinfo@fdic.gov); or (iii) by phone at (877) 275-3342.

LPL does not guarantee in any way the financial condition of the Banks or the accuracy of any publicly available financial information concerning the Banks and is not responsible for any insured or uninsured portion of a Deposit Account at a Bank. For additional details, please see “Account Opening and Management: Operational Details,” set forth in Appendix 1.

The key issues described below are:

- What Investment Accounts Are Eligible?
- What Is Deposit Insurance?
- Monitoring Deposit Insurance Coverage
- FDIC Insurance: Details and Examples of FDIC-Defined Ownership Categories
- What Are the Anticipated Interest Rates, Fees, and Related Conflicts of Interest?
- What are the Available Alternatives?
- Where to Find More Information on the Program Today and in the Future?

## WHAT INVESTMENT ACCOUNTS ARE ELIGIBLE?

The WBS program is available for brokerage and advisory accounts of an eligible type that are held by “eligible persons” and which are serviced by an LPL financial professional (such as a registered representative or investment advisory representative) affiliated with the Wintrust Investments, LLC investment program, or investment advisory representatives affiliated with Great Lakes Advisors, LLC. Eligible persons include individuals, trusts, sole proprietorships, and certain “for profit” entities, such as corporations, partnerships, associations, business trusts, and similar organizations.

Accounts other than advisory<sup>1</sup> retirement accounts are eligible for the WBS program if each holder of the account is an eligible person. In the future, LPL may, at its sole discretion, make additional account types eligible for the WBS program or may choose to treat an otherwise eligible person as ineligible if LPL becomes aware that the person is prohibited as a matter of law from holding balances at any Bank.

Account types eligible for the WBS program include:

- Strategic Asset Management (except retirement accounts)
- Strategic Wealth Management
- Manager Select (except retirement accounts)
- Manager Access Select (except retirement accounts)
- Optimum Market Portfolios—Advisory (except retirement accounts)
- Optimum Market Portfolios—Brokerage
- Model Wealth Portfolios (except retirement accounts)
- Personal Wealth Portfolios (except retirement accounts), and
- Brokerage

You may determine the account type that you hold by consulting the account packet documenting your account relationship or by reviewing your account statement, logging into AccountView, or by contacting your financial professional.

## WHAT IS DEPOSIT INSURANCE?

Cash balances swept to Banks through the WBS program are eligible for deposit insurance from the FDIC, an independent agency of the U.S. government, up to \$250,000 per depositor for each FDIC-defined ownership right and capacity (“Ownership Category”) with an individual Bank. The Ownership Category depends on LPL records as to the ownership of your LPL account. Cash balances swept from an LPL account into one or more Deposit Accounts maintained in the name of LPL as agent for the exclusive benefit of its customers benefit from FDIC insurance to the same extent as if deposited directly in the name of the accountholders.

### PASS-THROUGH COVERAGE

Under the rules of the FDIC, in the case of deposits made on behalf of holders of investment accounts by a broker-dealer acting as custodian for such customers, the interest of each beneficial owner may be determined on a fractional or percentage basis. The FDIC will recognize a claim for insurance coverage based on a such a custodial relationship only if the relationship is expressly disclosed, by way of specific references, in the “deposit account records” of the relevant insured depository institution. Deposit Accounts held with Banks by LPL reflects that it holds them as custodian for its customers.

If the deposit account records of an insured depository institution disclose the existence of a custodial relationship which provides a basis for additional insurance, the details of the relationship and the interests of other persons (including the Ownership Capacity) in the account must be ascertainable either from the deposit account records of

the insured depository institution or from records maintained, in good faith and in the regular course of business, by the LPL as the custodial depositor.

As required by the FDIC's rules, in the event of the failure of a Bank, LPL has the capacity provide to the FDIC the information needed to accurately determine the FDIC defined Ownership Categories and to calculate the deposit insurance coverage for each Deposit Account.

## MONITORING DEPOSIT INSURANCE COVERAGE

Any deposits (including certificates of deposit) that you maintain in any FDIC defined Ownership Capacity either (i) directly with a Bank or (ii) through an intermediary (such as LPL or another intermediary) in a particular FDIC-defined Ownership Category will be aggregated with WBS program Deposit Accounts in the same Ownership-Category with the same Bank for purposes of applying the \$250,000 FDIC deposit insurance coverage limit.

***Only you can monitor this risk and it is therefore important that you monitor non-WBS program deposits accounts with all the Banks on the ABL. Please notify your financial professional of any non-WBS program deposit accounts that you separately hold in an Ownership Capacity with any Bank on the ABL at is the same as your eligible account, so that your financial professional may ensure that LPL does not sweep WBS program cash into the Bank on your behalf. You may confirm your WBS program Deposit Account balances by reviewing your account statement, logging into AccountView, or by contacting your financial professional.***

As your agent, LPL will sweep cash out of your eligible accounts and into Deposit Accounts held with the participating Banks on the ABL. There are limits on both the aggregate amount of funds that such Banks are willing to accept, as well as on the maximum amount of FDIC deposit insurance available for each Ownership Category held with a Bank. LPL limits your total WBS program Deposit Accounts at any participating Bank to allow for the monthly interest to be applied to your cash balance at that Bank without exceeding the applicable maximum amount of FDIC deposit insurance. Should your account reach the applicable maximum at a particular Bank, LPL will, subject to the aggregate limits of available Bank capacity, sweep the excess cash to other participating Banks in a manner intended to maximize the aggregate amount of deposit insurance for each account (except for Excess Banks, see "Excess Banks" below). Additional cash held through the WBS program that is above the WBS program's maximum insurance coverage for you will not be eligible for FDIC deposit insurance. As of the date of this Disclosure Booklet, the maximum FDIC insurance offered through the WBS program is \$3,750,000 per individual, which assumes that you hold no FDIC-insured deposits at the participating Bank other than through the WBS program and that all Banks on the ABL have capacity to accept additional deposits.

Cash held in credit balances with LPL or invested in a money market mutual fund or other securities in your eligible account, as discussed below, is not eligible for FDIC deposit insurance but is eligible for protection by the Securities Investor Protection Corporation ("SIPC") (see SIPC Coverage, below). ***Deposit Accounts held through the WBS program are not eligible for SIPC insurance.***

If Deposit Accounts or other deposits at the Bank are assumed by another depository institution pursuant to a merger, consolidation or purchase and assumption, such deposits will continue to be separately insured from the deposits that you might have established with the acquirer until:

- i. the later of the expiration of six months after the assumption and the maturity date of the certificates of deposit or other time deposits which are assumed, or
- ii. with respect to deposits that are not time deposits, the expiration of a six-month period from the date of the assumption.

Thereafter, any assumed deposits will be aggregated with your existing deposits with the acquirer held in the same FDIC-defined Ownership Category.

## IF A BANK FAILS AND DEPOSIT INSURANCE IS PAYABLE

In the event that a Bank fails and it is necessary to make a claim for federal deposit insurance, covered payments of principal, plus unpaid and accrued interest, will be made to you based on records provided to the FDIC by LPL (see Pass-Through Coverage). There is no specific time period during which the FDIC must make insurance payments available. Furthermore, you may be required to provide certain documentation to the FDIC and LPL before deposit insurance payments are made with respect to any Deposit Accounts.

FDIC insurance protects against the loss of deposits due if an FDIC-insured bank fails. LPL itself is not an FDIC-insured institution. Only the cash deposited within the Deposit Accounts at the Banks are eligible for FDIC insurance. Eligibility for pass-through deposit insurance coverage is subject to fulfilling specific conditions. Furthermore, the investment products identified herein that are not covered by FDIC insurance do not constitute bank deposits and are subject to investment risks, including the potential loss of the amount invested. These products are distinct from the interest-bearing FDIC-insured deposit accounts made available through the WBS program's Banks.

## FDIC INSURANCE: DETAILS AND EXAMPLES OF FDIC-DEFINED OWNERSHIP CATEGORIES

The application of the \$250,000 federal deposit insurance limitation is illustrated by several common factual situations discussed below.

### NON-RETIREMENT ACCOUNTS

**Individual Customer Accounts:** If your eligible account is reflected on LPL's records as being owned by a single individual or entity, the total available deposit insurance for that individual or entity of all deposits held in the same Ownership Category with an individual Bank is \$250,000.

This category includes, as well, accounts of "sole proprietorships," single-name accounts containing community property funds, and accounts of a decedent and accounts held by executors or administrators of a decedent's estate.

**Guardian, custodian, or conservator accounts:** If the eligible account is reflected on LPL's records as being held by an agent, guardian, custodian, or conservator for the benefit of their ward, or for the benefit of a minor under the Uniform Gifts to Minors Act, funds swept into a Deposit Account at a Bank will be insured to the same extent as if they were deposited in the name of the ward, minor, or other beneficiary in the same Ownership Category.

**Qualifying Joint Accounts:** If the eligible account is reflected on LPL's records as being owned jointly by more than one individual, then funds swept into a Deposit Account at a Bank will be insured up to \$250,000 per individual owner, separate from any single ownership deposit accounts held with the same Bank. A joint LPL eligible account shall be deemed to be a "qualifying joint account" only if:

- i. all co-owners of each eligible account reflected on LPL's records are "natural persons"; and
- ii. LPL's records reflect that each co-owner possesses withdrawal rights on the same basis.

**Joint Accounts Other than a Qualifying Joint Accounts.** If an eligible account is reflected on LPL's records as being owned jointly by one or more entities (which may include any individuals), the deposit account will be treated as being owned by each named owner, as an individual, corporation, partnership, or unincorporated association, as the case may be, and the actual ownership interest of each individual or entity in such account shall be added to any other single ownership accounts of such individual or other accounts of such entity at an individual Bank, and will be insured in accordance with the provisions governing the insurance of single ownership accounts.

**Trust Accounts:** If the eligible accounts are reflected on LPL's records as being held in either of the following types of relationship, it would be treated for deposit insurance purposes as described below:

- i. informal revocable trusts, such as eligible accounts that are payable-on-death accounts, in-trust-for accounts, and Totten trust accounts;

- ii. formal revocable trusts, defined to mean eligible accounts held pursuant to a written revocable trust agreement under which a deposit passes to one or more beneficiaries upon the grantor's death; and
- iii. Irrevocable trust deposits, meaning eligible accounts held pursuant to an irrevocable trust established by written agreement or by statute.

Because these deposits are considered to be part of the same category for deposit insurance purposes, they would be aggregated when applying the deposit insurance limit. Deposits from such eligible accounts will be insured in an amount up to the \$250,000 multiplied by the total number of beneficiaries identified by each grantor, up to a maximum of 5 beneficiaries. In the case of trusts interests of a beneficiary that pass from the same grantor, they would be aggregated for purposes of determining deposit insurance coverage at the individual Bank, whether or not held in connection with an informal revocable trust, formal revocable trust, or irrevocable trust. The deposit insurance coverage provided to beneficiaries of such trusts is separate from coverage provided for other deposits held by such beneficiaries at the same Bank.

Unless otherwise specified in LPL's records with respect to the related eligible accounts, the eligible account held in connection with a trust established by multiple grantors is presumed to have been owned or funded by each grantor in equal shares.

The total number of beneficiaries with respect to an eligible account held by a trust will be determined as follows:

- (i) Eligible beneficiaries include only natural persons, and charitable organizations and other non-profit entities recognized as such under the Internal Revenue Code of 1986, as amended.
- (ii) Beneficiaries do not include:
  - a. The grantor(s) of the trust; or
  - b. A person or entity that would only obtain an interest in the trust if one or more identified beneficiaries are deceased
- (iii) If the trust agreement provides that trust assets will pass into one or more new trusts upon the death of the grantor(s) ("Future Trusts") the Future Trust(s) are not treated as beneficiaries of the trust. Instead, the Future Trust(s) are viewed as mechanisms for distributing the trust and the beneficiaries that are eligible beneficiaries would be treated as the "beneficiaries" that will receive the trust assets through the Future Trusts.
- (iv) If an informal revocable trust designates the holder of the eligible account's trust as its beneficiary, the informal revocable trust account will be treated as if the eligible account were titled in the name of the formal trust.

In the case of an informal revocable trusts, LPL's eligible account records must reflect the names of beneficiaries. In the case of a formal revocable trust, the title of the LPL eligible account must include terminology sufficient to identify the account as a trust account, such as "family trust" or "living trust," or must otherwise be identified as a testamentary trust in the account records of LPL. If eligible beneficiaries of such formal revocable trust are specifically named in the eligible account records of LPL, the FDIC will presume the continued validity of the named beneficiary's interest in the trust unless the FDIC has reason to believe that such records misrepresent the actual ownership of deposited funds and such misrepresentation would increase deposit insurance coverage, in which case the FDIC may consider all available evidence and pay claims for insured deposits on the basis of the actual rather than the misrepresented ownership.

In the case of revocable trust co-owners that are sole beneficiaries of the trust, deposits held in connection with the trust are treated as joint ownership deposits. Deposits of employee benefit plans, even if held in connection with a trust, are treated as an employee benefit plan described below under “Retirement Accounts”.

Even though deposits in trust accounts are eligible for FDIC insurance as described above, the WBS program allocates trust account deposits across multiple Banks to ensure that the aggregate trust deposits at any single Bank do not exceed the \$250,000 per bank FDIC insurance limit (subject to the use of Excess Banks, defined below). The program maximum FDIC insurance remains for these accounts.

### **BUSINESS ACCOUNTS**

If the eligible account is reflected on LPL’s records as being owned by a business, funds swept into a Deposit Account in a Bank will be added to other deposits of such business held in the same Ownership Category with the Bank and insured up to \$250,000 in the aggregate. In the case of a business that is a sole proprietorship, for deposit insurance purposes, swept funds will be treated as funds of the person who is the sole proprietor and added to any other funds of that person held in the same Ownership Category.

### **RETIREMENT ACCOUNTS**

If you hold a retirement account in an eligible account type, you may have interests in various retirement plans and accounts that have placed deposits in accounts at the Banks. The amount of deposit insurance to which you will be entitled, including whether the Deposits held by the retirement plan or other eligible account will be considered separately or aggregated with the deposits with the same Bank held by other retirement plans or accounts, will vary depending on the type of retirement plan or account. It is therefore important to understand the type of retirement plan or account holding the deposits.

***IRAs and other Self-Directed Retirement Accounts:*** IRAs (including Roth IRAs), self-directed Keogh accounts, and certain other self-directed retirement accounts (such as government-sponsored 457 plans and private employer-sponsored 401(k) plans) are insured up to \$250,000 per depositor. Each person’s deposits in self-directed retirement accounts at the same Bank are added together and insured up to \$250,000, separately from any retirement accounts that are not self-directed and any non-retirement accounts.

***Pass-Through Deposit Insurance for Employee Benefit Plan Deposits:*** Employee benefit plan accounts are deposits of a pension plan, profit-sharing plan or other employee benefit plan that is not self-directed. Employee benefit plan deposits are insured up to \$250,000 for each participant’s non-contingent interest in the plan if certain requirements are met. This coverage is known as pass-through insurance because the insurance coverage passes through the plan administrator to each participant’s interest or share. This means that instead of an employee benefit plan’s deposits at one Bank being entitled to only \$250,000 of insurance in total, each participant in the employee benefit plan is entitled to insurance of his or her interest in the employee benefit plan’s deposits of up to \$250,000 per Bank (subject to the aggregation of the participant’s interests in different plans, as discussed below). The pass-through insurance provided to an individual as an employee benefit plan participant is in addition to the \$250,000 deposit insurance allowed on other deposits held in an individual or other recognized insurance capacity by an individual with the Bank.

A deposit held by an employee benefit plan eligible for pass-through insurance is insured for an amount equal to the number of plan participants multiplied by \$250,000. For example, an employee benefit plan owns \$550,000 in deposits at one Bank. The employee benefit plan has two participants, one with a vested non-contingent interest of \$300,000 and one with a vested non-contingent interest of \$250,000. In this case, the employee benefit plan’s deposits would be insured up to only \$500,000; the individual with the \$300,000 interest would be insured up to the \$250,000 limit and the individual with the \$250,000 interest would be insured up to the full value of such interest.

The contingent interests of employees in an employee benefit plan and overfunded amounts attributed to any employee benefit plan are not insured on a pass-through basis. Contingent interests of an employee in an employee benefit plan deposit are interests that are not capable of evaluation in accordance with FDIC rules, and are



aggregated and insured up to \$250,000. Similarly, overfunded amounts are insured, in the aggregate for all participants, up to \$250,000 separately from the insurance provided for any other cash owned by or attributable to the employer or an employee benefit plan participant.

**Aggregation of Plan and Account Deposits:** Under FDIC regulations, an individual's interests in Plans maintained by the same employer or employee organization (e.g., a union) which are holding deposits of the same institution will be insured up to \$250,000 in the aggregate. In addition, under FDIC regulations an individual's interest in the deposits of one Bank held, for example, (i) in an IRA, (ii) government-sponsored 457 plan, (iii) self-directed Keogh plan, or (iv) self-directed defined contribution plan will be insured up to \$250,000 in the aggregate, whether or not maintained by the same employer or employee organization.

## WHEN ACCOUNTS TRANSFER OWNERSHIP

If you become the owner of deposits at a Bank as a result of the death of another depositor, the FDIC will aggregate other deposits held by you in the same Ownership Category with the same Bank for purposes of the \$250,000 deposit insurance limit beginning on the earlier of six months after the death of the depositor or the restructuring of the affected accounts. The FDIC provides the six-month grace period to permit you time to restructure your deposits to obtain the maximum amount of deposit insurance for which you are eligible.

## BALANCE TRANSFERS PURSUANT TO THE WBS PROGRAM

On any business day when your account's cash is transferred, all of your account's cash will be held temporarily at the clearing bank ("Intermediary Receiving Bank") used by LPL to settle deposits to the underlying beneficiary bank. When held at the Intermediary Receiving Bank, your account's cash will temporarily be uninsured. Once distributed to Banks on the ABL, your account's cash will be eligible for insurance up to the current WBS program maximum deposit insurance, subject to cash balances that you hold in the same Ownership Capacity at such Banks, as applicable. The WBS program has adopted procedures to ensure the movement of assets in a timely manner and expects that your assets will be transferred by the close of business each day. In the unlikely event of a failure of wire transfer systems or communication facilities, your assets could remain at the Intermediary Receiving Bank until the next business day (or until such systems/facilities are fully restored).

## WHAT ARE THE ANTICIPATED INTEREST RATES, FEES, AND RELATED CONFLICTS OF INTEREST?

The amount of anticipated annual interest you will receive on cash maintained in Deposit Accounts is calculated by taking the amount of cash being swept to the Bank through the WBS program multiplied by the annual interest rate that corresponds to your household balance tier.

## INTEREST RATES AND HOUSEHOLD BALANCE CALCULATIONS

The interest rates you receive will vary based upon the aggregate value of all linked eligible assets you and other eligible persons in your household maintain in your eligible Deposit Accounts ("Household Balance"). In determining your Household Balance, the eligible accounts of all persons at the same address may be linked. LPL may grant requests to link other accounts at its discretion. Certain accounts may not be eligible for linking. The eligible assets of linked accounts are not commingled, and the accountholder or accountholders of any linked eligible account retains control over such account. LPL may change or terminate Household Balance eligibility without notice. It is your obligation to notify your financial professional or LPL of accounts that you would like to be linked to another eligible account.

Customers with greater Household Balances typically receive a higher interest rate than customers with lower Household Balances. LPL will determine your Household Balance each day. Once you instruct your financial professional to link your eligible accounts, the previous day's Household Balance will determine your interest rate tier for the next day. The most up-to-date, different Household Balance tiers and their corresponding interest rates

are found by visiting <https://www.wintrustwealth.com/disclosures.html>. The corresponding interest rates may change from time to time.

You will receive the same interest rates on all Deposit Accounts regardless of the Bank in which such assets are held. Interest will accrue daily on Deposit Account balances from the day cash is deposited into a Bank through the business day preceding the date of withdrawal from that Bank.

Interest will be compounded daily and credited monthly. The interest rates paid are determined by the amount the Banks are willing to pay minus the fees paid to certain third parties (described below). The rate of interest accruing on your Deposit Account balances may change as frequently as daily without prior notice.

The interest rates paid on a Deposit Account by a Bank may be higher or lower than the interest rates available to depositors making deposits directly with the Bank or other depository institutions in comparable accounts and for investments in money market mutual funds and other cash equivalent investments available through LPL. You should compare the terms, interest rates, required minimum amounts, and other features of the WBS program with other accounts and alternative investments.

The WBS program should not be viewed as a long-term investment option. If you desire to maintain cash balances for other than a short-term period or are seeking higher yields currently available in the market, please contact your financial professional to discuss investment options to maximize your potential return while maintaining your preferred level of liquidity and safety.

## FEES AND RELATED CONFLICTS OF INTEREST

LPL does not receive a fee or compensation from the participating Banks in connection with WBS.

However, if your participating eligible account is an advisory account, LPL will receive an advisory fee on the cash maintained in WBS

The Banks will each receive certain benefits in connection with the WBS program. The participation of the WBS program is expected to increase the Banks' deposits and potentially contribute to their overall profitability. However, your financial professional does have a financial incentive to recommend that your cash not be swept to the WBS program, as they do not receive compensation for such sweeps.

Other service providers with respect to the WBS program, including a third-party administrator of WBS, will receive fees. Other than these stated fees, there will be no charges, fees, or commissions imposed on your account with respect to the WBS program.

## WHAT HAPPENS WHEN THERE IS INSUFFICIENT BANK DEPOSIT CAPACITY?

The ability of the WBS program to sweep your uninvested cash into Bank deposit accounts depends on the Banks' capacity to accept additional deposits. The Banks have agreed with LPL to provide deposit capacity necessary for the WBS program, which can change from time to time.

## EXCESS BANKS

After you reach the WBS program's maximum deposit insurance coverage for each FDIC defined Ownership Capacity available to you—which may depend, among other things, on deposit capacity of the Banks on the ABL and on your decision to opt out of any such Banks—any additional funds/cash will be deposited into one or more of excess banks ("Excess Banks"), subject to available capacity at the Excess Banks. If the Excess Banks do not have capacity for such cash, then any additional cash will be deposited to another Bank on the ABL, which will then be considered an Excess Bank if it has capacity to accept the deposit. If there is insufficient capacity at the Excess Banks and insufficient

capacity to move your balances to another Bank on the ABL, then the cash balances above the maximum insurable amount will be placed in the Client Cash Account.

## WHAT ARE THE AVAILABLE ALTERNATIVES?

If your account is an eligible account and you do not wish to have your available cash swept through the WBS program, you may contact your financial professional for assistance to turn off the automatic cash sweep.

### FREE CREDIT BALANCES

As a result, any cash balances will be held with LPL as uninvested cash, or free credit balances, in your account.

Uninvested cash held in your account, referred to as free credit balances, may be used by LPL in the ordinary course of its business subject to the restrictions of SEC Rule 15c3-3 under the Securities Exchange Act of 1934. The use of client free credit balances generally generates revenue for LPL in the forms of interest and income (less amounts paid to the client on such balances), which LPL retains as additional compensation for its services to its clients. Under these arrangements, LPL will generally earn interest, or a return based on short-term market interest rates prevailing at the time.

LPL does not share this compensation with your financial professional. Uninvested cash held in your account is not insured or guaranteed by the FDIC or any other government agency but is protected by the SIPC.

During such time that you hold free credit balances in your account, you will receive interest in the same manner as Deposit Accounts. Interest paid on free credit balances may be lower than that paid on WBS program Deposit Account, but please speak with your financial professional to obtain more information about current yields on free credit balances under the WBS program.

### MONEY MARKET MUTUAL FUNDS (MMF)

Shares in the MMF that LPL offers as a non-sweep investment alternative may be purchased at the direction of the accountholder. Cash balances in your account, however, will not be automatically swept into those MMFs.

Debits in your account will be paid automatically from available cash balances in the account, and then from funds in the sweep programs. In the event there are no funds available in these accounts to cover debits, you would need affirmatively to liquidate separately purchased MMF holdings or other securities to cover the required debits or move cash from another investment or bank accounts.

### SIPC COVERAGE

The investment performance or redemption value of money market mutual funds is not insured or guaranteed by the FDIC or any other government agency, including SIPC. Although the fund seeks to preserve a net asset value of \$1.00 per share, there is no guarantee that this will occur and it is possible to lose money by investing in money market mutual funds. Money market mutual funds are eligible for coverage by the Securities Investor Protection Corporation (SIPC).

LPL is a member of SIPC. For accounts held at LPL, SIPC provides account protection up to a maximum of \$500,000 per customer, of which \$250,000 may be claims for cash held directly with LPL. This account protection applies when a SIPC member firm fails financially and is unable to meet obligations to securities customers, but it does not protect against losses from the rise and fall in the market value of investments. More information on SIPC, including obtaining a SIPC brochure (available at <https://www.sipc.org/news-and-media/brochures>), may be obtained by calling SIPC at (202) 371-8300 or by visiting [www.sipc.org](http://www.sipc.org) for coverage by the Securities Investor Protection Corporation.

## WHERE TO FIND MORE INFORMATION ON THE PROGRAM TODAY AND IN THE FUTURE?

Transactions and activity with respect to your cash in your eligible account and in Deposit Accounts with Banks will appear on your periodic account statement. For each statement period, your account statement will reflect:

- Deposits to and withdrawals on your behalf into the Deposit Accounts
- The balance of your Deposit Account with each Bank as of the end of the applicable statement period
- Interest earned on your WBS program Deposit Account balances

The Banks to which your cash is swept may change at any time during a month—your account statement will reflect which Banks hold your Deposit Account as of the date of the statement. Your financial professional can assist you if you have any questions about how your account statement reflects your Deposit Accounts at each Bank. You may obtain additional information about credit balances in your eligible account or in Deposit Accounts with WBS participating Banks by calling your financial professional or, if applicable, by accessing your account through LPL AccountView. If you have not subscribed to LPL AccountView and wish to do so, please contact your financial professional to subscribe.

All notices from LPL detailed in this document may be made by means of a letter, an entry on or insert with your account statement, or an entry on a trade confirmation or by other means. Many pieces of information are also found on [lpl.com](http://lpl.com).

## APPENDIX 1

Included in this Appendix are additional details on several concepts discussed within the brochure.

### ACCOUNT OPENING AND MANAGEMENT: OPERATIONAL DETAILS

When sweeping cash to Banks in the WBS program, two types of accounts are established at each Bank on behalf of you and other LPL customers: a money market deposit account (MMDA), which is a type of savings deposit, and a linked transaction account (TA). The MMDAs and TAs are non-transferable.

Deposit Account ownership will be evidenced by a book entry on the account records of each Bank showing the Deposit Account as an agency account held by LPL for the benefit of you and other LPL customers, and by records maintained by LPL as your agent. No evidence of ownership, such as a passbook or certificate, will be issued to you. Your account statements will reflect your balances at the Banks. You should retain the account statements for your records. You may at any time obtain information about your cash by contacting your financial professional. The Banks will not provide you with information or accept instructions from you with respect to your cash in the Deposit Account that has been established by LPL on your behalf through the WBS program.

We will attempt to place your cash balance at Banks on the ABL, subject to your instruction to designate one or more Banks as ineligible. Your cash is placed in a given Bank based upon LPL's third-party administrator's allocation algorithm.

If a Bank no longer has capacity to take new cash or your cash allocated to a Bank reaches \$246,500 (or \$493,000 for joint accounts), LPL, as your agent, will leverage a MMDA and TA at another Bank on the ABL. If that Bank is unable to accept your cash, due to overall capacity being unavailable, your instruction not to place funds with that Bank or your maximum being reached, we will continue down the list of Banks on the ABL. The process will be repeated when additional cash is to be deposited with your cash going to the highest available Bank in the priority sequence managed via the third party algorithm.

As your agent, LPL will deposit available cash balances in the MMDA at each Bank as set forth above. All withdrawals will be made from the TA at a Bank by LPL as your agent. As necessary to satisfy debits in your account (securities purchases, checking, debit card, etc.), cash will be transferred from the MMDA to the related TA at each Bank. The cash will be withdrawn from your TAs at the Banks. If the funds in the TA is insufficient to satisfy a debit, funds in the related MMDA at the Bank will be transferred to the TA to satisfy the debit, plus cash to maintain any TA threshold amount.

At any point during a month in which transfers from an MMDA at a Bank have reached the any applicable withdrawal limit, all cash will be transferred from that MMDA to the linked TA at the Bank until the end of the month. Deposits for the remainder of the month into this Bank will be made to the TA. At the beginning of the next month, cash on deposit in the TA will be transferred to the MMDA, minus any threshold amount to be maintained in the TA. The limits on MMDA transfers will not limit the number of withdrawals you can make from cash on deposit at a Bank or the amount of FDIC insurance coverage for which you are eligible.

Due to federal banking regulations, each Bank reserves the right to require seven business days' notice before you withdraw cash balances from your Deposit Accounts. The Banks have informed us that they do not currently intend to exercise this right. So long as this right is not exercised, your ability to access cash, including the ability to write checks against your brokerage account, should not be impacted.

If you decide to terminate your participation in the WBS program sweep option, you may establish a direct relationship with each Bank or any other bank by making a request to the bank to establish a deposit account in your name, subject to such bank's rules with respect to establishing and maintaining deposit accounts.

Once that is done, you would contact LPL and request a transfer of the cash in the Deposit Account into your individual deposit account. Establishment of the deposit account directly in your name at a bank will separate the deposit accounts from the LPL account. If you establish a direct depository relationship with a bank, the deposit accounts will no longer be reflected in your account statement and LPL will have no further responsibility concerning the deposit accounts.

## TAXES

For most customers, interest earned on deposits in the Deposit Accounts will be taxed as ordinary income in the year it is received. A Form 1099 will be sent to you each year showing the amount of interest income earned on your WBS program cash sweep deposits. You should consult with your tax advisor about how the WBS program affects your potential tax liability.

**Wintrust Investments, LLC and the banks through which the Wintrust Investments, LLC and Great Lakes Advisors, LLC investment programs are offered (including Wintrust Bank, N.A., affiliate banks of Wintrust Bank, N.A. and correspondent banks of Wintrust Bank, N.A.) are not registered as broker-dealers or investment advisors. Great Lakes Advisors, LLC is a registered investment advisor, but is not registered as a broker-dealer. Registered representatives of LPL offer products and services through LPL Financial, Member FINRA/SIPC using Wintrust Investments, LLC, and may also be employees of your bank. These products and services are being offered through LPL or its affiliates, which are separate entities from, and not affiliates of, your bank, Wintrust Investments, LLC or Great Lakes Advisors, LLC.**

## APPENDIX 2

### WBS PROGRAM AVAILABLE BANK LIST

- **Barrington Bank & Trust Company, National Association** (Barrington, IL)
- **Beverly Bank & Trust Company, National Association** (Chicago, IL)
- **Crystal Lake Bank & Trust Company, National Association** (Crystal Lake, IL)
- **Hinsdale Bank & Trust Company, National Association** (Hinsdale, IL)
- **Lake Forest Bank & Trust Company, National Association** (Lake Forest, IL)
- **Libertyville Bank & Trust Company, National Association** (Libertyville, IL)
- **Macatawa Bank** (Holland, MI) – *Beginning on May 15, 2025*
- **Northbrook Bank & Trust Company, National Association** (Northbrook, IL)
- **Old Plank Trail Community Bank, National Association** (New Lenox, IL)
- **Schaumburg Bank & Trust Company, National Association** (Schaumburg, IL)
- **State Bank of The Lakes, National Association** (Antioch, IL)
- **St. Charles Bank & Trust Company, National Association** (Saint Charles, IL)
- **Town Bank, National Association** (Hartland, WI)
- **Village Bank & Trust, National Association** (Arlington Heights, IL)
- **Wheaton Bank & Trust Company, National Association** (Wheaton, IL)
- **Wintrust Bank, National Association** (Chicago, IL)

**If you have any questions about LPL's Automatic Cash Sweep Programs, including the Wintrust Banks Sweep™ Program, please ask your financial professional.**

**This material has been prepared by LPL Financial.**