Securities and insurance offered through Wintrust Investments, LLC (Member FINRA/SIPC)

Regulation Best Interest Disclosure

December 20, 2021

Wintrust Investments, LLC (WTI, we or us) is registered with the U.S. Securities and Exchange Commission (SEC) as both a broker-dealer and investment adviser. WTI is also a member of the Financial Industry Regulatory Authority, Inc. (FINRA) and the Securities Investor Protection Corporation (SIPC).

This guide summarizes important information concerning the scope and terms of the brokerage services we offer, the capacity in which we are acting, the type and scope of our services, any material limitations on our services, the fees and costs associated with your holdings, accounts, and transactions, and details the material conflicts of interest that arise through our delivery of brokerage services to you. We encourage you to review this information carefully, along with any applicable account agreement(s) and disclosure documentation you may receive from us.

Our brokerage services are the primary focus of this guide. For more information on our investment advisory services and how they differ from brokerage, please review our Customer Relationship Summary (or Form CRS) available at wintrustwealth.com/disclosures. Our Form CRS contains important information about the types of services we offer, both brokerage and investment advisory, along with general information related to compensation, conflicts of interest, disciplinary action and other reportable legal information.

Free and simple tools are available for you to use at Investor.gov/CRS, a website maintained by the SEC. These tools can provide you with educational materials about broker-dealers, investment advisers, and investing.

Please carefully review and consider the information in each section below.

Brokerage Services

When you establish a brokerage account with us, you have the ability to buy, sell and hold investments within your account. The primary service we provide is our trading capability. We execute purchases and sales on your behalf, and as directed by you. In a brokerage services relationship, we can trade with you for our own account, for an affiliate or for another client, and we can earn a profit on those trades. The capacity in which we act is disclosed on your trade confirmation. However, we are not required to communicate it in advance, obtain your consent, or inform you of any profit earned on trades.

Brokerage Service Models and Products

We offer three (3) different levels of brokerage service from which you can choose:

1. **Full Service** - Under a full service relationship, your Financial Professional offers a full suite of investment and insurance products, services and strategies (including investment advisory services, financial planning, etc.) based on your specific needs and investment profile.
2. **Limited Advice** - Under a limited service relationship, your Financial Professional offers you access to a limited universe of investment products, services and strategies (including 3rd party managed investment advisory services) based on your investment profile.

Investment products such as stocks, bonds, and mutual funds are:
NOT FDIC INSURED | NOT BANK GUARANTEED | MAY LOSE VALUE | NOT A DEPOSIT | NOT INSURED BY ANY FEDERAL GOVERNMENT AGENCY

3. **Self-Directed** - Under a self-directed relationship, you will not receive securities transaction or investment strategy recommendations.

Cash Brokerage and Margin Brokerage Accounts

We provide brokerage services through either a cash brokerage account or margin brokerage account, based on your eligibility and selection. In a cash brokerage account, you must pay for your purchases in full at the time of purchase. In a margin brokerage account, you must eventually pay for your purchases in full, but you may borrow part of the purchase price through lending we make available from our clearing firm, First Clearing.[1] This is generally referred to as a "margin loan." The portion of the purchase price that is loaned to you is secured by securities in your account, also referred to as "collateral." You will incur interest costs as a result of your margin activity. While many securities are eligible to be used as collateral for a margin loan, some assets are not available for margin collateral purposes.

Given that a margin-enabled brokerage account has specific eligibility requirements, unique costs, and governing regulatory requirements, our default brokerage option is our cash brokerage account. You must execute a separate margin agreement before engaging in margin brokerage activity. Included with your margin agreement is a copy of the Margin Disclosure Statement. This statement contains important information you should understand and consider before establishing a margin brokerage relationship with us. For more information on our margin brokerage services, contact a WTI Financial Professional or refer to our Margin Disclosure Statement available at wintrustwealth.com/disclosures.

Brokerage Account Types

We offer the opportunity to open accounts that will be held with our clearing firm as well as held directly with the issuer of the investments purchased. In both cases, we offer many different account types, including individual and joint accounts, custodial accounts, Delivery Versus Payment (DVP) accounts, estate and trust accounts, partnership accounts, education accounts (*i.e., 529 College Savings Plans and tax-free Coverdell accounts*), and retirement accounts as outlined in our account agreement(s) (*i.e., IRA, Roth IRA, or SEP-IRA accounts*), specialty accounts (*i.e., cash or margin accounts*), and accounts with access to options trading. You should refer to our account agreement(s) for more information concerning available account types or speak with a Financial Professional.

Incidental Brokerage Services, Recommendations and Account Monitoring

Within your brokerage account, we may also provide other incidental services such as research reports, and recommendations to buy, sell, or hold assets. When we make a securities recommendation, investment strategy recommendation or recommendation to rollover assets from your Qualified Retirement Plan (QRP) to an Individual Retirement Account (IRA), the recommendation is made in our capacity as a broker-dealer unless otherwise stated at the time of the recommendation. Any such statement will be made verbally to you. Moreover, when we act in a brokerage capacity, we do not agree to enter into a fiduciary relationship with you.

It is important for you to understand that when our Financial Professionals make a brokerage recommendation to you, we are obligated to ensure the recommendation is in your best interest, considering reasonably available alternatives and based on your stated investment objective, risk tolerance, liquidity needs, time horizon, financial needs, tax status, and other financial information you provide us. Note that, depending on your individual Financial Professional's licensing and qualifications, there may be limits on what he or she is be able to recommend, such that his/her recommendations may not take into account all of the products and services we offer. You should ask your Financial Professional about any limitations on what he/she can offer you.

Important Note Regarding Certain Employee Benefit Plans, Including IRAs and Education Savings Accounts. When we provide investment advice to you regarding your retirement plan account, IRA or Coverdell Education Savings Account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

See "Acknowledgment of Our Fiduciary Status with Respect to Retirement Accounts," on page 1, for more detail about our further obligations as a fiduciary when we make recommendations for these accounts.

[1] First Clearing is a trade name used by Wells Fargo Clearing Services, LLC.

You may accept or reject any recommendation. It is also your responsibility to monitor the investments in your brokerage account, and we encourage you to do so regularly. We do not commit to provide ongoing monitoring of your brokerage account. If you prefer ongoing monitoring of your account or investments, you should speak with a Financial Professional about whether an advisory services relationship is more appropriate for you.

Please also consider that from time to time we may provide you with additional information and resources to assist you with managing your brokerage account. This may include, but is not limited to, educational resources, sales and marketing materials, performance reports, asset allocation guidance, and/or periodic brokerage account reviews. When we offer these services and information, we do so as a courtesy to you. These activities are not designed to monitor specific investment holdings in your brokerage account, they do not contain specific investment recommendations about investment holdings, and you should not consider them a recommendation to trade or hold any particular securities in your brokerage account. Upon your request, we will review such information and reports with you and may provide you with investment recommendations, but we are not under a specific obligation to do so.

Clearing Services

We have entered into an agreement with First Clearing to carry your account and provide certain back office functions. We and First Clearing share responsibilities with respect to your account as set forth in the Designation of Responsibilities delivered to you upon opening your account. Please refer to the Designation of Responsibilities for more information on how such responsibilities have been allocated between us.

Understanding Risk

It is important for you to understand that all investment recommendations and activities involve risk, including the risk that you may lose your entire principal amount invested. Further, some investments involve more risk than other investments. Higher-risk investments may have the potential for higher returns but also for greater losses. The higher your “risk tolerance” – meaning the amount of risk or loss you are willing and able to accept in order to achieve your investment goals – the more you may decide to invest in higher-risk investments offering the potential for greater returns. We align risk tolerances with investment needs to offer you different investment objectives from which to choose. You should select the investment objective and risk tolerance best aligned with your brokerage account goals and needs. For more information regarding investment objectives and investment risks, please go to wintrustwealth.com/disclosures.

Cash Sweep Program Feature

Our brokerage services include a cash sweep program feature. This program permits you to earn a return on un-invested cash balances in your brokerage account by allowing cash balances to be automatically “swept” into a “cash sweep vehicle,” until such balances are otherwise required to satisfy obligations arising in your account. These cash sweep vehicles include interest-bearing deposit accounts, and if available, money market mutual funds or such other sweep arrangements made available to you. Our default sweep vehicle is our proprietary Insured Bank Deposits Program (IBD) offered through affiliated Wintrust community banks. This program uses accounts insured by the Federal Deposit Insurance Corporation (FDIC). You will receive additional information concerning the cash sweep program in the Insured Bank Deposit Program Disclosure Statement in your account agreement(s), or it can be found at wintrustwealth.com/disclosures. Please review that Disclosure Statement carefully.

Account Minimums and Activity Requirements

There is no minimum account balance required to open or maintain a brokerage account with us. However, if you either fail to fund your account or do not return account opening documents as required, your account will be closed. In addition, some types of brokerage accounts have minimum account activity requirements that must be maintained, or your brokerage account will be assessed an annual fee. These requirements are detailed in the account agreement(s) you receive when you open your brokerage account.

You should also understand that our Financial Professionals may establish their own minimum account balance requirements for the brokerage accounts they service. For example, a dedicated Financial Professional may choose to service only those brokerage account clients who satisfy account-specific or total household asset conditions. Minimum asset requirements are disclosed to you verbally by your Financial Professional.

Investment Philosophy

We seek to balance risk and return, and our target market is retail customers who are primarily seeking to invest to meet retirement, education, or other similar funding goals, and secondarily to invest for legacy purposes. Our retail platform includes traded investments, investment funds and products, and investment strategies believed to be in the best interest of our customers. We require our Financial Professionals to have a reasonable basis, taking into account the potential risks, rewards, and costs associated with a recommendation, to believe that each recommendation made to a retail customer is in the retail customer's best interest based on his/her investment profile, and does not place the interest of our firm or Financial Professional ahead of the interest of the retail customer at the time the recommendation is made.

Material Limitations

We offer a wide range of brokerage services, and do not limit our investment offerings to specific asset classes, or investments with third-party arrangements such as revenue sharing payments or mutual fund servicing fees. In addition, we do not limit our investment offerings to investments issued, sponsored, or managed by us or our affiliates.

Notwithstanding the wide range of our brokerage services, there are certain material limitations on our services and the services of our Financial Professionals, and these limitations are set forth below:

- Investment limitations based upon your Financial Professional's licensing (*i.e., some can offer brokerage, investment advisory, and insurance products and services while others are limited in which of these they can offer*).
- We will not automatically monitor a brokerage account without your specific request and our agreement in writing.
- We will not manage a brokerage account on a discretionary basis (*i.e., we will not execute any transactions in your account without receiving your consent in advance in writing*).
- Each of our service models has certain limitations in terms of scope of services and products offered.
- Investment offerings may be limited due to First Clearing's constraints or our lack of selling agreements with certain providers of mutual funds and annuities.

Brokerage Fees

It is important to consider that while a brokerage relationship can be a cost-effective way of investing your assets, it is not for everyone given the fees and costs involved.

Fees and Costs Associated with Transactions and Holdings

You will pay transaction-based fees each time you trade in your brokerage account or make a new investment. These transaction-based fees are generally referred to as a "commission," "markup," "sales load," or a "sales charge." The transaction-based fees vary depending on the investment and the size or amount of the transaction, and also depend on certain other factors such as:

- Underlying product selection
- Your brokerage service model and account type
- Size of your transaction and/or overall value of your account
- Frequency of your trade activity

You may be assessed additional transaction fees in your brokerage account. These include fees for clearing brokerage services such as postage fees and fees assessed by the Securities and Exchange Commission on equity sales.

These transaction-based fees presents a conflict for us because they create an incentive to encourage you to trade more and make additional investments.

In addition, investments that are interests in investment funds, such as mutual funds, closed-end funds, interval funds, and Unit Investment Trusts (UITs), or products such as 529 College Savings Plans (529s) and variable insurance products, bear ongoing fees and expenses that are embedded into the cost of the investment holding. You pay these ongoing fees and expenses indirectly because they are factored into the cost of the investment.

Fees and Costs Associated with Your Account

You will pay fees for various operational services provided to you through your brokerage account. These fees include:

- Account transfer fees for when you transfer your account to another brokerage firm.
- IRA account termination fee for when you close your IRA account (except when you take a full IRA distribution after the age of 59½).
- Annual account fees. Costs will vary depending on the account type.
- Account maintenance fees, such as wire fees, securities transfer fees, returned or stopped checks, physical stock issue, and stock deposit or direct registration deposit rejections.

These fees are set at least annually and communicated to you through information included in your account statement and other notifications. These fees do not apply to all account types and may be waived under certain conditions.

You should understand that, depending on the brokerage service model you choose, the fees and costs you are charged may vary for the same or similar products, accounts and services. For more information concerning our administrative and service fees, visit us at wintrustwealth.com/disclosures.

How We Are Compensated

We receive direct and indirect compensation in connection with your accounts. Direct compensation is taken directly from your affected account. Indirect compensation is compensation paid to us in ways other than directly from your account, including by third parties in whose products you invest, and may impact the value of the associated investments in your account. The sections below describe the compensation we receive in connection with various investments that may be available to you. In many cases, the descriptions that follow refer to a product's prospectus or offering document that you would receive in connection with a particular investment.

Commission Rates for Stocks, Rights, Warrants, Secondary Market Closed Ends Funds (CEFs) and Exchange Traded Products (ETPs)

Stocks (common and preferred), rights, warrants, CEFs, and ETPs are all traded on a national stock exchange, such as the New York Stock Exchange. You can elect to buy or sell these instruments at the current market price, or seek to do so at a price that you establish (a "limit price"). Depending on your account's service model, the commissions we charge you (and pay a portion of to your Financial Professional) for trades of these instruments will range from 0.15% to 2% depending on the size of the transaction, with a minimum commission that depends on the service model. For example, if you were working with a Financial Professional in our Full Service model and bought 100 shares of stock at a price of $50 per share, your commission would be $100. For more specific information regarding our commission schedules, please to go to wintrustwealth.com/disclosures.

Full Service Commissions are subject to limited discounting at a Financial Professional's discretion, with certain restrictions.

In addition to the commission on the trade, CEFs and ETPs have internal expenses that will be deducted from the value of the investment. For more information regarding these fees, please reference the respective investment's prospectus.

Commission Rates for Equity and Index Options

Options are investment instruments that give you the ability to buy or sell the underlying stock or index at a pre-set price in the future. Options are traded on an option exchange, such as the Chicago Board Option Exchange, and can be traded at the market price or at a limit price. Depending on your account's service model, the commissions we charge you (and pay a portion of to your Financial Professional) for options trades will range from 1.2% to 2% depending on the size of the transaction, with a minimum commission that is dependent on the service model. For example, if you were working with a Financial Professional in our Full Service model and bought 10 option contracts at a price of $2 per contract, your commission charge would be $100. For more specific information regarding our commission schedules, please go to wintrustwealth.com/disclosures.

Full Service Commissions are subject to limited discounting at a Financial Professional's discretion, with certain restrictions.

Fixed Income Securities

We transact fixed income securities trades, including for bonds and brokered certificates of deposit (CDs), through a bond dealer. The dealer sets the price for the bond offering, typically based on the relationship between the bond's interest rate and the current interest rate benchmarks. We typically apply an additional charge (*i.e., a markup or markdown*) of up to 3.5% of the amount of your transaction. For example, if you were working with a Financial Professional in our Full Service model, and you were to buy $10,000 of a municipal bond with 10 years until maturity, your markup would be $200. Note that we may incur gains (or losses) on positions we hold in inventory, as a result of market movements or other events that impact the value of the securities we own.

The amount of our markup/markdown on a bond transaction will depend on a number of factors and the particular circumstances of each transaction, including: type of bond (corporate, municipal, government); transaction size; credit quality; unit price; maturity date; and liquidity. For more information regarding our markup/markdown guidelines, please go to wintrustwealth.com/disclosures.

Syndicate Offerings

We may sell you new-issue offerings from various providers of fixed income instruments (including new-issue CDs, structured products, CEFs, and preferred stock) on which we earn an underwriting credit (*i.e., a discount in the price we pay*). With new issues, however, the markup is generally included in the purchase price, so you would not pay separate transaction costs. For example, if you were to buy $10,000 of a new-issue CD, we would earn an underwriting credit directly from the issuer, but you would still only pay $10,000.

Mutual Funds

We currently offer a large number of mutual funds, with varying share class structures and investment styles. If you invest in mutual funds we receive direct compensation, and may also receive indirect compensation, in connection with such investments, as described below.

You will typically pay a sales charge, or "load," when you buy shares in a mutual fund. The fund pays us a portion of this sales charge for our Financial Professionals' efforts in selling the fund's shares.

Most mutual funds offer multiple share classes, with differing fees and expenses for distribution and shareholder services. Though there are many different types of share classes, the most common share classes we offer are Class A and Class C shares. Each class typically has different fees and costs, and therefore the fund's performance results will differ across share classes depending on the amount of fees and expenses that reduce performance. You should also note that the amount of time you expect to hold your investment in a mutual fund may play an important role in determining which share class is most appropriate for you, and you should discuss this consideration with your Financial Professional.

When you invest in Class A mutual fund shares, a specific percentage of that initial investment is taken out as a commission paid to the mutual fund's managers. This charge normally ranges from 0.00% to 5.75% of the amount invested, and the fund pays the majority of it to us. We pass on up to 2.5% to your Financial Professional and retain any remaining amount. Class A shares typically have lower internal expense fees than other share classes. Some Class A share purchases may qualify for a reduced front-end sales charge due to "breakpoint discounts" based on the amount of your transaction and "rights of accumulation" - meaning the fee is reduced once your total purchases in a particular fund family add up to a specified number of shares. You can also qualify for a breakpoint discount and lower sales charge if you have not yet purchased the specified number of shares but you promise to buy more shares in the same fund family within the following 13 months (*i.e., provide a "letter of intent"*). In addition, some purchases may qualify for a sales charge waiver based on the type of account, and/or certain qualifications within the account, as detailed in the fund's prospectus. You should contact your Financial Professional for more information or if you believe you may be eligible for a sales charge waiver. Class A shares are typically recommended when buying to hold for longer time periods, such as longer than 10 years, and in larger dollar amounts (*i.e., over $100,000*). For a purchase of $10,000 of Class A shares in a fund with a sales charge of 5.75%, the sales charge would be $575. Please reference the fund's prospectus for the specific sales charge schedule. .

When you invest in Class C mutual fund shares, you would not pay a front-end sales charge when purchasing the fund, but instead would pay the issuer a Contingent Deferred Sales Charge (CDSC) if you withdraw money from the fund before the end of its minimum required holding period. This is sometimes referred to as a “back-end load.” The CDSC holding period is typically 12 months from the date of purchase, and a CDSC charge would be up to 1% of your investment. A CDSC is not passed on to us or your Financial Professional. Since Class C shares do not have front-end sales charges, there are no breakpoint discounts so you would not benefit from rights of accumulation or letters of intent by making additional investments in these shares. Internal expense fees for Class C shares are typically higher than Class A shares. Class C shares are typically recommended when buying to hold for shorter time periods, such as for less than 10 years, and in smaller dollar amounts (*i.e., under $100,000*). A purchase of $10,000 of Class C shares would not have an initial sales charge, but if you sold before the end of the CDSC holding period (*i.e., 12 months*), your CDSC could be as much as $100. Please reference the fund’s prospectus for the specific CDSC holding period and sales charge schedule.

Ongoing Mutual Fund Fees and Expenses

Mutual funds deduct other ongoing fees and expenses, such as management fees or servicing fees, from fund assets. These ongoing fees and expenses are typically used to pay the mutual fund’s continued annual operating expenses (sometimes referred to as its “expense ratio”), such as paying the fund’s investment manager, accounting and audit expenses, and recordkeeping expenses. These ongoing fees and expenses are typically charged daily as a percentage of your assets. You pay these fees and expenses indirectly because they are deducted from your assets on an ongoing basis. These fees range from 0.25% to 2%.

Mutual funds also pay us annual 12b-1 fees, also known as trails, out of fund assets under a distribution and servicing arrangement to cover our expenses for distribution (and sometimes shareholder servicing) that we may provide for the fund. These fees are asset-based fees charged by the fund family and will vary based on share class purchased. These 12b-1 fees are a portion of the overall ongoing fees described above. Shareholder servicing fees are paid to respond to investor inquiries and provide investors with information about their mutual fund holdings. These fees range from 0.00% to 1.00% of the fund value, but the majority of these fees are below 0.85%. The fund passes these fees on to us and we pay a portion to your Financial Professional.

Each fund’s prospectus describes the amount and frequency of all fees and expenses the fund will charge you, and the fund’s payments to us. Fees and expenses disclosed in the fund’s prospectus are charged against the fund’s overall investment value. (Please note that 12b-1 fees and similar fees or compensation received in connection with our affiliated Great Lakes funds are not retained, or are rebated, on ERISA assets held in Advisory Program accounts.)

Variable Annuities

We offer variable annuities from certain insurance companies. Those companies pay us commissions of up to 7% of the amount invested for each sale of their annuities, as well as ongoing trail commissions. The commissions and trails they pay us vary by product type and may vary by insurance carrier. We pass on up to 3.5% to your Financial Professional and retain any remaining amount.

Certain annuity contracts also include optional benefit features and riders, which may entail additional fees charged on top of the base fee associated with the contract. These fees range from 0.25% to 2% on an ongoing basis. Note that if you terminate an annuity contract before the conclusion of its surrender period, the annuity carrier will charge a surrender fee based on the value of the contract. Surrender charges will start as high as 7% and will decrease annually as you get closer to the end of the surrender period. We do not receive the surrender charge.

Variable annuities typically charge Mortality and Expense (M&E), Administrative Expense, and Sub-Account Expense fees on the underlying value of the annuity. The M&E fee on average ranges from 0.85% to 1.5% and the Administrative expense typically ranges from 0% - 0.3% annually. Variable annuity sub-accounts are similar to mutual funds, and charge ongoing expenses for fund management and administration. The expenses for these underlying investments range from 0.25% to 3.0% annually, and are typically charged daily on a prorated basis as a percentage of your assets. Please refer to the prospectus for more information on sub-account expenses.

If you were to buy $25,000 in a variable annuity with a sales charge of 7%, the entire $25,000 is invested into the annuity, and the insurance company would pay $1,750 in commission to us.

Variable Life Insurance

We offer variable life insurance from certain insurance companies. The initial commission can be up to 70% of the first year's premium, followed by 3% to 5% commissions per year as long as the policy remains in effect. Typically with life insurance, the premiums paid must first cover the cost of the insurance and the remainder of the premium is used to fund the cash value. Similar to a variable annuity, the cash value invests in sub-accounts, and certain life insurance contracts also include optional benefit features and riders, which may entail additional fees charged on top of the base fee associated with the contract. A surrender charge may also be assessed to withdraw any cash value, based on the age of the policy.

For additional information, please see the applicable product prospectus.

Fixed and Indexed Annuities

We offer fixed and indexed annuities from certain insurance companies. These companies pay us commissions of up to 7% of the amount invested for each sale of their annuities, as well as ongoing trail commissions. The commissions and trails they pay us vary by product type and may vary by insurance carrier. We pass on up to 3.5% to your Financial Professional and retain any remaining amount.

Certain annuity contracts also include optional benefit features and riders, which may entail additional fees charged on top of the base fee associated with the contract. These fees range from 0.25% to 2% on an ongoing basis. Note that if you terminate an annuity contract before the conclusion of its surrender period, the annuity carrier will charge a surrender fee based on the value of the contract. Surrender charges will start as high as 7% and will decrease annually as you get closer to the end of the surrender period. We do not receive the surrender charge.

Unlike variable annuities, typically there are no M&E, administrative, or underlying investment expenses.

Market Linked Structured Products

Subject to due diligence review, we offer limited forms of structured products, which are more complex securities whose value is based on a designated reference asset, market measure or investment strategy. Structured products can be issued in various forms, including publicly offered and privately placed debt securities, publicly offered and privately placed pooled investments (such as CEFs and trusts), and certificates of deposit. Some structured products are listed on securities exchanges, while others trade in over-the-counter secondary markets.

Structured products are typically sold as new issue offerings. For such an investment, the issuer would pay us a fixed commission of up to 5% based on the principal amount of your purchase. We pass on up to 3.5% to your Financial Professional and retain any remaining amount. If you were to buy $10,000 of a structured product with a commission rate of 5%, the entire $10,000 is initially invested, and the issuer would pay us a commission of $500. For additional information, please see the applicable product prospectus.

Unit Investment Trusts (UITs)

We offer both Equity and Fixed-Income UITs. We typically offer UITs as new issue offerings, meaning you would pay us a fixed commission based on the principal amount of your purchase, a portion of which we pass on to your Financial Professional. UITs also deduct other fees and expenses from trust assets, such as organizational and operating expenses. These fees and expenses include portfolio supervision, recordkeeping, administrative fees, and trustee fees. UITs also charge creation and development fees, which compensate the sponsors for creating and developing the trusts. UIT fees may total a maximum of up to 2.75%. We also earn payments from UIT sponsors in the form of gross acquisition profits and volume concessions.

Any front-end sales charge is deducted from the initial investment, and any deferred charges are deducted from the net asset value based on the issue's Deferred Sales Charge Schedule. The specific sales charges will vary based on the type of UIT and duration of the issue. For additional information, please see the applicable product prospectus.

If you were to purchase $10,000 of a UIT maturing in 15 months, there would not be an initial sales charge, but over the following 15 months, the UIT sponsor would deduct 1.85% ($185) in deferred sales charges and UIT expenses.

Education Accounts

We offer both 529s and Coverdell Education Savings Accounts (ESAs). 529s are sponsored by a particular state, and generally provide tax benefits if the 529 plan's beneficiary resides in the state sponsoring the plan. A 529 invests into 529-specific mutual fund share classes, such as Class A or Class C shares, that mirror traditional mutual funds in terms of fees and commissions (see the "Mutual Fund" section above for more detail). 529 Class A shares have a sales charge schedule of 0% to 5.75%, with additional fund expenses of up to 2%. 529 Class C shares typically do not have an initial sales charge, but have fund expenses of up to 2%, with a CDSC of up to 1% if you sell your position before the end of the CDSC period. For more specific information about a 529 fund, please see the corresponding prospectus.

ESAs, on the other hand, are brokerage accounts and can invest in any investment allowable in a brokerage account. Owners of an ESA can buy stocks, bonds, and mutual funds in an ESA, and each purchase would be subject to the respective investment's commission and fee schedules (see the "Stock", "Fixed Income", and "Mutual Fund" sections above for more

information). Money disbursed from a 529 or an ESA is considered tax-free provided the proceeds are used towards qualifying education expenses, as defined by the IRS regulations.

Interval Funds

Interval funds resemble mutual funds, except for certain limitations with respect to liquidity. Typically interval funds offer multiple share classes, such as Class A and Class C shares, with sales charges and fund expenses that are similar to mutual fund Class A and C shares (see the "Mutual Fund" section above for more detail). The unique characteristic of interval funds is their limited liquidity. Interval funds will offer a tender period on a specified periodic basis, such as quarterly, during which investors can submit a request to redeem their shares. The interval fund will impose certain limits, as detailed in its prospectus, on the number of shares that can be sold in a given period. Therefore, if the tender offer is oversubscribed, only a prorated number of shares will be sold.

Alternative Investments Information

From time to time, based on due diligence review, we may offer alternative investment products such as hedge funds, managed futures funds, private placements, non-traded Real Estate Investment Trusts (REITs) and 1031 tax-deferred exchange products. Many alternative investments are only available for certain eligible investors, as defined by regulation. The fees and commissions associated with these products are unique to each offering, and are disclosed in the applicable offering documents. We typically pay your Financial Professional a portion of any fees or commissions (up to a maximum of 3.5% of amount invested) the investment sponsor pays us for such investments.

For additional information, please see the applicable offering document.

Cash Sweep Program/Bank Deposit Sweep/Other Float Compensation

Brokerage accounts that are held in the custody of our clearing firm, First Clearing, typically will participate in a "sweep program" for the automatic purchase and redemption of cash balances in connection with free credit balances and to satisfy debit balances (net of free credit balances). We sweep un-invested cash into a short-term investment product (such as an FDIC-Insured bank deposit account or a money market fund) for cash management. Unless you choose otherwise, our default is to sweep such cash balances using the proprietary IBD Program offered through our affiliated Wintrust community banks. Through the IBD Program, available cash balances in your participating brokerage account are automatically deposited into one or more interest-bearing, bank deposit accounts established at Wintrust community banks that are insured by the FDIC.

The Wintrust community banks each pay us a fee for each Brokerage Account that has funds swept to it as part of the IBD Program, but you do not pay this fee. The fee is currently $25 per Brokerage Account per Bank. This fee is subject to change to a maximum of $40 per Brokerage Account and we may waive all or part of this fee. We may pay a portion of this fee to First Clearing for 1099 reporting, statement issuance and other services provided in connection with the IBD Program. For additional information regarding the IBD Program, please go to wintrustwealth.com/disclosures.

Operational Fees

First Clearing will charge your account for various operational services provided to you through a brokerage account. These fees include annual account maintenance fees that are subject to certain minimum levels of activity. These annual fees can be waived based on certain household criteria or account type. Additionally, First Clearing charges operational service fees for certain operational functions such as wires fees, fees for stopped or returned checks, fees for physical certificate issuance, and stock deposit rejection fees. For additional information regarding these Operational Fees, please go to wintrustwealth.com/disclosures.

Account Transfer or Termination Fees

If you transfer your account to anther brokerage firm, First Clearing will assess your account either an account transfer fee, or if it is an IRA account, an IRA termination fee. In either case, we receive a percentage of these fees. IRA termination fees will be waived if you are taking a final distribution from your IRA account after age 59½. For additional information regarding Operational Fees, please go to wintrustwealth.com/disclosures.

Brokerage - Excluded Advisory Account Assets

As described above, our brokerage services differ from our investment advisory services. However, in some instances we may allow an advisory client to trade what are referred to as "excluded assets" within their advisory services account. Excluded assets are not subject to our advisory program fees. Instead of our advisory fees, these excluded assets are subject to our standard brokerage commissions when traded.

Interest on Margin Accounts

In accounts with margin debits, First Clearing will charge interest on these debit balances monthly based on an annualized interest rate. We receive a portion of this interest as revenue.

Securities Based Lending

We offer a Securities Based Lending Program in which you may, in certain circumstances, use your brokerage account assets as collateral when you apply for a loan from one or more of our affiliated Wintrust community banks. Under this relationship, the lending bank will charge you interest on the amount borrowed, and pay a portion of the interest to us and your Financial Professional.

Conflicts of Interest

Conflicts of interest exist when we provide brokerage services to you. A conflict of interest arises when an economic benefit incentivizes us and/or our Financial Professional to put our interest(s) ahead of yours. The mere presence of a conflict of interest does not imply that your interest will be harmed, but it is important that we acknowledge the presence of conflicts. Moreover, our regulatory obligations require that we establish, maintain, and enforce written policies and procedures reasonably designed to address conflicts of interest associated with our recommendations to you.

Our conflicts of interest are typically the result of compensation structures and other financial arrangements between us, our Financial Professionals, our clients and third parties. We offer a broad range of investment services and products and we receive various forms of compensation from our clients, affiliated and non-affiliated product providers and money managers, and other third parties as described above. Securities rules allow for us, our Financial Professionals, and our affiliates to earn compensation when we provide brokerage services to you. However, what we and our Financial Professionals earn often varies based upon the product or service you purchase, which creates a financial incentive to recommend investment products and services that pay us more.

We are committed to taking appropriate steps to identify, mitigate and avoid conflicts of interest to ensure we act in your best interest when providing you brokerage recommendations. Below you will find the material facts related to our conflicts of interest and the conflicts of interest of our Financial Professionals. This information is not intended to be an all-inclusive list of our conflicts, but generally describes those conflicts that are material to your brokerage relationship. In addition to this disclosure, conflicts of interest are disclosed to you in your account agreement(s) and disclosure documents, our product guides and other information we make available to you.

Conflicts for the Firm

Receipt of Revenue Sharing Payments

We have revenue sharing agreements with the various mutual fund and insurance companies whose products we may recommend for you to purchase and hold. These include:

- Payments from mutual fund and insurance companies in the form of 12b-1 fees, service fees, trail commissions or renewal commissions, which are fully described in the applicable prospectus or offering document.

- Payments from insurance companies when we provide services for Inforce Contract Service Agreements where your Financial Professional is the agent of record.
- Underwriting discounts or concessions associated with new offerings of equity, fixed-income or other investments.
- Payments from UIT sponsors in the form of gross acquisition profits and volume concession.
- Reallowance fees from REIT sponsor in the form of payments to us for marketing and distribution expenses.

Recommendations of Proprietary Products, Products of Affiliates, or a Limited Range of Products

Our brokerage recommendations may include investments in products or services that are managed, issued or sponsored by our affiliate(s). We and our affiliate(s) will receive additional compensation or economic benefits from your investment in such products, including, but not limited to, management credits, service fees and similar revenue sharing arrangements. The compensation we and our affiliate(s) receive related to your investment in these products may be greater than from investments in similar products provided by unaffiliated third parties. Thus, we have an incentive to recommend investments in affiliated proprietary products.

As detailed in the description of our cash sweep program above, the Wintrust community banks provide our default cash sweep option, the IBD Program, and as such they benefit financially from cash balances held in IBD. As with other depository institutions, the banks' profitability is determined in large part by the difference or "spread" between the interest they pay on deposit accounts, such as IBD, and the interest or other income they earn on loans, investments and other assets. The banks' participation in IBD increases their respective deposits and, accordingly, may increase their overall profits. The use of IBD as our default cash sweep option creates a conflict of interest because, as discussed above, we receive a fixed payment from the banks for each deposit account opened, and because the banks benefit from holding the cash deposits. You may be able to earn higher rates by investing your un-invested cash balances in other, non-affiliated, sweep options. Your Financial Professional can tell you more about other available alternatives. For more information regarding the Wintrust IBD program, go to wintrustwealth.com/disclosures.

We may also refer brokerage clients to certain of our other affiliate companies, as follows:

- **Great Lakes Advisors, LLC (GLA)** - An SEC-registered investment advisor based in Chicago, IL. Offers individuals and institutions investment management services including but not limited to separately managed accounts and unified managed accounts. GLA is also the portfolio manager for the Great Lakes family of mutual funds in the Managed Portfolio Series Trust. GLA is one of the portfolio managers we recommend for our clients who open investment advisory accounts, and we receive a portion of the advisory fee GLA charges, which creates a conflict of interest. Further, we have an incentive to recommend GLA funds, which charge management fees that benefit GLA and a portion of which are passed on to us.
- **The Chicago Trust Company, N.A. (TCTC)** - A federally-chartered trust bank that offers individuals and institutions a wide range of trust and investment management products and services, including corporate trustee services, personal trust administration, estate settlement, land trusts, 1031 exchanges, guardianships, and special needs trusts. Our Financial Professionals may refer potential clients to TCTC whom they believe would benefit from the products and services it provides.
- **Chicago Deferred Exchange Company (CDEC)** - Provides qualified intermediary and exchange accommodation titleholder services to investors seeking to defer gain under Internal Revenue Code Section 1031. From time to time, we might refer a potential client to CDEC who indicates an appropriate need for its service.
- **Wintrust Community Banks** - Fifteen separately-chartered national banks that each offer traditional banking services such as savings and checking accounts, mortgages, personal loans, debit/credit cards and certificates of deposit. From time to time we might refer a client for banking services.

Both GLA and TCTC charge asset-based fees on the value of the accounts under their management or advisement. If our Financial Professional refers you to GLA or TCTC and you invest using the products or services they offer, GLA or TCTC pays us a percentage of their fee as compensation for the referral, and we pay a portion to the Financial Professional. Financial Professionals may also receive compensation for referrals to CDEC.

Securities Based Lending

If you qualify for and elect to participate in our Securities Based Lending Program, a portion of the interest generated from the collateralization of your brokerage account will be payable to us and your Financial Professional. This creates a benefit to the

Wintrust community bank(s) that lend based on your account assets and an incentive for your Financial Professional to recommend you apply for a loan using your account as collateral.

Non-Purpose Securities-Based Loan

If you qualify for and elect to participate in the Priority Credit Line (PCL) Lending Program made available by First Clearing, a portion of the interest generated from the collateralization of your brokerage account will be payable to us and your Financial Professional. This creates a benefit for us based on your outstanding loan amount and an incentive for your Financial Professional to recommend you apply for a PCL using your account as collateral.

Recommendation of a Transaction to be Executed in a Principal Capacity

When you buy or sell fixed income securities in a brokerage account, consistent with industry regulations, we will typically impose a markup (increase) or markdown (decrease) in your price if we sell them to you, or buy them from you, to/from our own inventory. We act as a “principal” in such a transaction. We make money based upon the difference between the price you pay for securities purchased from us and the lower prevailing market price (a markup), or the difference between the price we purchase such securities from you and the higher prevailing market price (a markdown). We maintain policies and procedures reasonably designed to help ensure compliance with industry rules relating to markups and markdowns.

Interest on Margin Accounts

In accounts with margin debits, First Clearing will charge you interest on these debit balances monthly based on an annualized interest rate. We receive a portion of this interest as revenue, so we have an incentive to recommend that you use margin on your accounts.

Clearing Firm Contractual Conflicts

We are a fully disclosed, introducing broker-dealer that uses First Clearing to custody and execute our business on your behalf. Our contract with First Clearing includes clauses that could benefit us financially if we reach certain milestones in terms of the volume of our activity or assets under management with First Clearing. Therefore, we have an incentive to recommend certain strategies that will benefit us.

Recommendations That are Made Considering the Cost to the Firm of Effecting the Transaction or Strategy on Your Behalf

In some cases, the costs imposed by the clearing firm could impact the recommendations made by us and our Financial Professionals. In these cases, the Financial Professional may recommend an investment or strategy that minimizes these costs.

Compensation for Sales Management

Compensation for managers or supervisors that are tied to production levels of branches or regions over which they have managerial or supervisory responsibility may create an incentive to encourage sales even when they are not in a retail customer's best interest.

Conflicts for the Financial Professional

Our Financial Professionals are compensated in a variety of ways based on revenue generated from sales of products and services to clients (brokerage) and/or total assets under advisement (investment advisory). Cash and non-cash compensation, incentives, contests, quotas, and bonuses for Financial Professionals are tied to factors including asset accumulation or growth, total sales, and appraisals or performance reviews. In addition to upfront transaction-based compensation, some products feature on-going residual or “trail” payments. These arrangements incentivize your Financial Professional to encourage more trading and the purchase of additional investments that would result in your Financial Professional meeting his or her sales targets.

Our Financial Professionals’ monthly compensation is determined by applying a percentage payout formula based on total commissions and fees they generate during the month, less applicable expenses according to our established firm policies. Typically, a Financial Professional’s payout schedule (which we periodically adjust at our discretion) increases with revenue generated. The same payout schedule is reduced when a Financial Professional discounts certain client fees and commissions, or their overall client relationship asset levels are below the minimum levels we set from time to time.

Financial Professionals also may be eligible for annual or ongoing bonuses and deferred compensation awards based upon a variety of factors that may include reaching certain production levels, referrals to affiliates or other targets, as well as compliance with our policies and procedures and meeting best business practices.

Our Financial Professionals are eligible for a participation in the Wintrust Financial Corporation's Long-Term Incentive Plan (LTIP). LTIP awards are granted annually and are based on the amount of compensation earned by qualifying Financial Professionals, subject to minimum production levels. As a result, Financial Professionals have an incentive to provide brokerage recommendations designed to sell more investment products and services, as well as investment products and services that carry higher fees or earn higher commissions. Financial Professionals also have an incentive to provide brokerage recommendations to gather more assets under management and to increase brokerage trading activity, and to reduce the amount of discounts available to you. As noted above, Financial Professionals receive referral payments for client referrals that result in investments in certain of our affiliates' products and services, so they have an additional incentive to make such recommendations.

Financial Professionals have an incentive to recommend you roll over assets from a Qualified Retirement Plan held elsewhere (such as an employer's 401(k) plan) to a brokerage Individual Retirement Account (IRA) with us because of the compensation they will receive. We maintain policies and procedures designed to ensure that rollover recommendations are in your best interest.

Brokerage accounts, unlike investment advisory accounts, do not feature an ongoing fee based on assets under management. Because brokerage accounts generate commissions based on transactions, if your brokerage account has minimal trading activity, your Financial Professional is incentivized to recommend you transition your brokerage services account to an advisory account to generate ongoing revenue. Further, Financial Professionals are incentivized to recommend you transition your brokerage account to an advisory account after you have made purchases resulting in commissions and/or other transaction-based brokerage fees. We have controls established to identify and mitigate this risk.

We pay recruitment compensation to Financial Professionals who join WTI from another financial firm. This compensation varies by Financial Professional, but typically includes either an upfront or backend award based upon new client assets they bring to our firm and/or revenue generated from such client assets. This creates an incentive for the Financial Professional to recommend his/her clients transfer assets to us, including brokerage assets, and open up brokerage accounts with us in order to earn this recruitment compensation.

We also provide Financial Professionals certain other forms of compensation, including non-cash compensation, based on their overall revenue generation as follows:

- Chairman's Club – each year we recognize our top performing Financial Professionals based on their overall production and contributions to the firm. An eligible Financial Professional and guest is invited to an expense-paid recognition conference that offers additional training. The program does not reward Financial Professionals based on specific product recommendations.
- Salary Allocation – budget to compensate your Financial Professional's support staff. This is intended to offset expenses he/she may otherwise pay for that support staff.
- Business Development Budget (BDB) – annual, 100% reimbursement budget for eligible business expenses. Expenses can be submitted for approval and full reimbursement, up to the amount of BDB allocated to that Financial Professional for the calendar year. BDBs are calculated for each producing Financial Professional or team based on prior year's production.
- Financial Professional Titles (*i.e., Registered Representative, Financial Advisor, Vice President of Investments, First Vice President of Investments or Senior Vice President of Investments*) – based upon achieving a specified level of revenue generated over a specific time period.

Financial Professionals are also compensated in the form of expense-paid education meetings and recognition trips. Portions of these programs are subsidized by our third-party providers, investment managers or distributors of products such as mutual funds, annuities, UITs, and insurance products. Consequently, product providers that sponsor and/or participate in such education meetings and recognition trips gain opportunities to build relations with our Financial Professionals, which could cause the Financial Professionals to recommend and sell more of these providers' products. Financial Professionals may also receive certain promotional items, meals, entertainment, and other non-cash compensation from product providers, all of which create an incentive for our Financial Professionals to recommend investments from those product providers.

Receipt of Third Party Compensation for Services Provided

Third-Party payments we receive may be based on new sales of investment products, creating an incentive for us to recommend you buy and sell, rather than hold, investments. In other cases, these payments are made on an ongoing basis as a percentage of invested assets, creating an incentive for us to recommend that you buy and hold investments (or, in the case of an investment advisory account, continue to invest through a third-party manager or adviser).

The total amount of payments we receive varies from product to product, and varies with respect to the third-party investment management products we recommend. It also varies from the compensation we receive in connection with other products and services we may make available to you, including advisory services when you open an investment advisory account. We have an incentive to recommend investment products and services that generate greater payments to us. This compensation generally represents an expense embedded in the investment products and services that is borne by investors, even where it is not paid by the product providers and not directly from the investment product or other fees you pay. The types of third-party compensation we receive include:

- **Trail Compensation.** We typically receive ongoing compensation from product providers and share it with our Financial Professionals. This compensation (commonly known as trails or Rule 12b-1 fees in the case of mutual funds) is typically paid from the assets of the investment product under a distribution or servicing arrangement and is calculated as an annual percentage of invested assets. The amount of this compensation varies from product to product. We have an incentive to recommend that you purchase and hold interests in products that pay us higher trails.

- **Other Revenue Sharing.** We have revenue sharing arrangements with various product providers. This compensation, which can include servicing fees and renewal fees, creates an incentive for us to recommend that you purchase and hold investments in the products offered by these companies.

Non-Cash Compensation from Third Parties

We work closely with many third-party providers, investment managers or distributors of products such as mutual funds, annuities, UITs, and insurance products who provide training and education compensation to offset or reimburse us for costs incurred in conducting comprehensive training and educational meetings for our Financial Professionals. These meetings or events are held to educate them on product characteristics, business building ideas, successful sales techniques and suitability, as well as various other topics. In addition, certain vendors provide free or discounted research or other vendor products and services, which can assist our Financial Professionals with providing services.

Likewise, from time to time, product providers will reimburse us for expenses incurred by individual branch offices in connection with conducting training and educational meetings, conferences, or seminars for Financial Professionals and participants. Also, Financial Professionals may receive promotional items, meals or entertainment or other non-cash compensation from product providers.

Although payments for training and education are not based on individual transactions or assets held in client accounts, it is important to understand that, due to the total number of third party products we offer, it is not possible for all companies to participate in a single meeting or event. Consequently, those product providers that do participate in training or educational meetings, seminars or other events gain an opportunity to build relationships with our Financial Professionals; these relationships could lead Financial Professionals to recommend those companies' products.

Additional Compensation from Product Providers and Other Third Parties

We and our Financial Professionals, associates, employees, and agents receive additional compensation from product providers and other third parties including:

- Gifts and awards (limited to $100 per provider to a Financial Professional per year), an occasional dinner or ticket to a sporting event of reasonable value, or reimbursement in connection with educational meetings or marketing or advertising initiatives, including services for identifying prospective clients.

- Reimbursement from product providers for research and technology-related costs, such as those to build systems, tools, and new features to aid in servicing clients.

Note: The amount of these payments is not dependent on or related to the level of assets that you or any other of our clients invest in or with the product provider.

Transition Compensation

Financial Professionals typically receive transition compensation when joining our firm from another firm. Such compensation is based on factors including the Financial Professional's prior revenue production, assets transferred to us, and expected revenue production while at our firm. Therefore, your Financial Professional may have a conflict when asking you to change firms with them because of this transition compensation.

Other Financial Professional Activities

Financial Professionals may be motivated to place trades for themselves ahead of client trades in order to receive more favorable prices than their clients. We have policies and procedures in place designed to prevent this activity.

Financial Professionals who are transitioning through a succession plan may be incentivized to make recommendations designed to increase the value of their "book of business" through asset accumulation or brokerage trades that are not in your best interest. Financial Professionals who receive clients from a retiring Financial Professional are incentivized to meet growth goals, which could result in recommendations not in your best interest. We have policies and procedures in place designed to prevent this from occurring.

Correspondent Financial Professionals

Some of our Financial Professionals, while registered representatives of our firm, are not employed by us but instead are employees of Non-Wintrust, unaffiliated banks on whose premises they work. We have revenue sharing agreements in place with those banks whereby we pay a bank a portion of the commissions and fees generated by a Financial Professional, and the bank pays the Financial Professional based on an agreed compensation program subject to our approval. These Financial Professionals are not eligible for the LTIP, Salary Allocation, or BDB programs described above.

Conflicts for Both the Firm and the Financial Professional

Charging of Commissions or Other Transaction-Based Fees

In your brokerage account, you pay certain fees (commissions and sales charges) in connection with buying and selling each investment product, including mutual funds, CEFs, interval funds, UITs, insurance, variable annuities, alternative investments, ETPs, equity securities, and bonds. Where these fees apply, the more transactions you enter into, the more compensation that we and your Financial Professional receive. This compensation creates an incentive for us to recommend that you buy and sell, rather than hold, these investments. We also have an incentive to recommend that you purchase investment products that carry higher fees, instead of products that carry lower fees or no fees at all.

Product Share Classes

Some mutual fund and variable annuity providers offer multiple share classes with each share class having a unique expense structure, and some having lower costs to you as compared to others. In addition, there are some mutual fund share classes that do not charge commissions and we do not receive compensation (*i.e., "no-load" funds*). We are incentivized to offer only funds that will charge sales loads. Further, we are incentivized to recommend those share classes or other product structures that will generate the highest compensation to us. For details regarding a particular fund's share class and fee structure, please see the applicable prospectus.

Recommendations for Our Advisory Programs

Advisory programs are fee-based accounts that charge an investment advisory fee on a quarterly basis based on the value of your account. These relationships may generate more revenue for the firm and your Financial Professional than a traditional brokerage account would. Further, the greater the value of your account, the higher the fee we charge, and the more we are compensated. This compensation creates an incentive for us to recommend that you increase your holdings under an investment advisory relationship.

Receipt and Offer of Differential Compensation Based on Product Sold

As described in the "How We Make Money" section above, the products we offer have different costs and features, and we earn differing levels of compensation. We are incentivized to recommend the products and services that will generate higher compensation.

Rollover Transaction Conflicts

We and our Financial Professionals have a conflict of interest in recommending that you roll over account assets from a retirement plan or IRA held elsewhere, for which we do not provide services or receive compensation, to an IRA in which we will provide services for compensation.

Outside Business Activities

Subject to our approval, our Financial Professionals may engage in outside business activities. These business activities are regularly reviewed for potential conflicts of interest.

Additional Resources

For additional information and access to a number of resources, please go to www.wintrustwealth.com/disclosures.

- Wintrust Investments
    - Wintrust Investments Form CRS
    - Wintrust Investments Form ADV Part 2A
    - Wells Fargo Advisors Wrap Program Brochure Part 2A Appendix
    - Margin Disclosure
    - Insured Bank Deposit (IBD) Program Information Statement
    - Investment Objective and Risk Disclosure
    - Operational and Custodial Fees
    - Wintrust Investments Commission Schedules
    - Legal Disclosures
    - Privacy Policy
- Great Lakes Advisors
    - Great Lakes Advisors Form CRS
    - Great Lakes Advisors Form ADV Part 2A
    - Great Lakes Guided Program Brochure Part 2A
    - Wintrust Multi Asset Strategies Wrap Brochure