

Customer Relationship Summary

Helping You Make an Informed Decision

Form CRS

Moloney Securities offers a wide range of investment and insurance solutions to investors. We offer brokerage services and investment advisory services as described in this Customer Relationship Summary. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences.

Our broker-dealer, Moloney Securities Co., Inc., is registered with the Securities and Exchange Commission (SEC), a member of the Financial Industry Regulation Authority (FINRA), a member of the Securities Investor Protection Corporation (SIPC), and an insurance general agent. Our investment adviser, Moloney Securities Asset Management LLC (MSAM), is an affiliate of Moloney Securities and is registered with the SEC (www.sec.gov).

When we do business with you, we and our financial professionals benefit financially from commissions, fees, and other payments from you and third parties, such as our investment product providers. These financial incentives create a conflict between our interest, your financial professional's interest, and your own. We encourage you to be a well-informed investor. This Customer Relationship Summary disclosure will give you information about the investments and services we offer, how we are compensated and our conflicts of interest.

Free and simple tools are available for you to use at <u>www.investor.gov</u>, a website maintained by the SEC. These tools can provide educational materials about broker-dealers, investment advisers, and investing. It is important that you understand the potential benefits, risks, fees, and costs of the services we provide.

We encourage you to:

- Read and understand disclosure information about the investments and services we offer and the related fees and costs for our services before you invest
- Ask your financial professional questions to help you understand the types of investment solutions we offer and the related fees or costs you pay for the solution
- Read and understand your investment disclosure information, account statements and trade confirmations, and understand the fees and costs that impact your investments and accounts

What investment services and advice can you provide me?

How do we choose the types of investments and investment services to recommend to you? Our financial professionals ask questions to learn about your investment objectives, risk tolerance, financial circumstances, liquidity needs, time horizon and investment experience. Your financial professional helps you identify your goals and assess which types of investments may be appropriate for you. Your financial professional serves as your key relationship contact for the investment services you select with us. For more information, please visit our broker-dealer's website at www.moseco.com, and our investment adviser's website at www.msam.net.

Terms to Know:

- A broker-dealer is a firm which works with customers to buy and sell securities in exchange for transaction-based fees.
- An investment adviser is a firm that provides investment advice or conducts securities analysis in exchange for asset-based fees.

Brokerage Services

We offer brokerage accounts, brokerage investments and insurance investments through our broker-dealer, Moloney Securities Co., Inc. Our broker-dealer is a fully disclosed introducing broker-dealer, which means we work with an unaffiliated clearing firm that provides the trade execution, custodian and custodial account-related services for our clients.

We offer many different brokerage account types, including individual and joint accounts, custodial accounts, estate and trust accounts, partnership accounts, individual retirement accounts, and other types of retirement accounts as outlined in our account agreement with you. There is no minimum initial account balance required to open a brokerage account with us; however, if you fail to fund your account or do not return account opening documents as required, your account will be closed.

We offer many securities products, including:

- Stocks
- Bonds (Corporate, municipal, government and agency)
- Mutual funds, closed end funds and money market funds
- ETFs (Exchange traded funds)
- UITs (Unit investment trusts)
- Brokered certificates of deposit
- Securities and non-securities related insurance products
- Private placements and alternative investments

Conversation Corner

Questions you might wish to ask when considering our services:

- Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

Brokerage services allow you to provide us with instructions to buy, sell and hold your investments. The brokerage accounts which we offer are non-discretionary, which means that each time you make a transaction, you give us permission to facilitate the transaction pursuant to your instructions. We offer periodic monitoring of your brokerage accounts to provide you with buy, sell and hold recommendations. We do not offer discretionary brokerage accounts or ongoing monitoring of brokerage accounts. We allow you to give us temporary or limited permission to make brokerage account transactions without us consulting with you first, such as to buy or sell securities to satisfy margin or other requirements. For more information on compensation and conflicts of interest for brokerage services, please read our *Regulation Best Interest Disclosure*, available at www.moseco.com. For more information about our fees for brokerage services, please read the *Fee Disclosure*, available at www.moseco.com.

Investment Advisory Services

Investment advisory services allow you to choose how involved you want to be with daily investment decisions. You may choose to delegate such decisions to investment professionals or choose a hands-on approach. The services we offer depend on which advisory program you select. We offer investment advisory account services on a discretionary and non-discretionary basis through our investment adviser, Moloney Securities Asset Management LLC. In a discretionary investment advisory account, you give us your permission to make the day-to-day investment decisions and transactions for your account, rather than having us consult you for your permission for each transaction. In a non-discretionary advisory account, each time you make a transaction, you give us permission to facilitate the transaction pursuant to your instructions. Our advisory services are provided only pursuant to a written agreement with you. A fiduciary responsibility to you is established only when it is stated in writing in our agreement with you.

Our advisory account services include investment management, investment planning, wealth management and pension consulting services. We offer these advisory services through our registered investment adviser as well as through third-party, or independent, investment advisers. Our registered investment adviser works with our affiliated broker-dealer or an unaffiliated broker-dealer, subject to our written agreement with you, to make investment transactions and works with an unaffiliated clearing firm which provides custodial and account-related services.

We offer continuous advice to our investment advisory clients. Our investment recommendations and advice are based on the information that you provide your financial professional about your objectives, goals, time horizon, risk tolerance, liquidity needs and financial circumstances. For a full description of our investment advisory services and the types of investment advisory programs which we offer, please read our Firm Brochure, which is prepared in accordance with SEC Form ADV, Part 2A, and is available on the SEC's Investment Adviser Public Disclosure website at www.msam.net. For a full description of our advisory account-related fees, please read the Fee Disclosure, available on our website at www.msam.net.

What fees will I pay?

- You will pay fees and costs whether you make or lose money on your investments. Fees
 and costs will reduce any amount of money you make on your investments over time.
 Please make sure you understand the fees and costs you are paying.
- You will pay fees and costs for account-related services, such as custodial services, account
 maintenance services, and certain operational services. Our broker-dealer works with an
 unaffiliated clearing firm that provides the trade execution, custodian and custodial
 account-related services for our clients. For a full description of your account-related
 fees, please read the *Fee Disclosure*, available on our website at www.moseco.com.

Conversation Corner

Questions you might wish to ask when considering our services:

- Help me understand how these fees and costs might affect my investments.
- If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?
- How might your conflicts of interest affect me, and how will you address them?

Brokerage Services Fees

- Brokerage services fees are transaction-based, which means they are based on the investment transactions you decide to make, such as buying and selling stocks, bonds, exchange traded products, mutual funds, and annuity contracts. Transaction-based fees may generally be referred to as commissions, mark-ups, sales loads, or sales charges. Transaction-based fees depend on many factors, such as type of investment, type of transaction, size of transaction, and whether discounts or fee waivers are available.
- You pay transaction-based fees each time you make a transaction. For example, you pay transaction-based fees if you buy or sell a stock, bond, ETF, UIT, mutual fund, annuity, private placement, or alternative investment. When you make an exchange-traded transaction, the transaction fees are identified in your trade confirmation.
- Transaction-based fees vary based on the type of investment you select and are described in the investment's prospectus or offering document, for example, mutual fund commissions are described in the prospectus which is provided to you. We encourage you to read and understand investment disclosure documents and the corresponding fees and costs of each investment before you invest.
- We and our financial professionals receive a portion of the transaction-based fees you are charged as compensation for our services. This creates a conflict of interest in the form of an incentive to recommend more transactions and to recommend investments which generate higher commissions or compensation.
- For more information on compensation and conflicts of interest for brokerage services, please read our Regulation Best Interest Disclosure, available at <u>www.moseco.com</u>. For more information about our fees for brokerage services, please read the Fee Disclosure, available at <u>www.moseco.com</u>.

Investment Advisory Fees

- Investment advisory services are asset-based, which means you are charged a set fee based on the amount of assets under management in your account and as agreed to in your advisory services agreement with us.
- Asset-based fees are assessed and collected quarterly. Unless otherwise specified in your advisory services agreement, the advisory fee is
 automatically deducted from the account quarterly, based on the net asset value of the securities under management in the account.
 Many factors determine fee rates, including the size, complexity and composition of the services to be provided. While fees are
 negotiable based upon these factors, generally, our advisory fee will not exceed 2% per annum.
- You will not pay transaction or trading fees when you make transactions, however, you will pay for the securities and investment products which you purchase, as well as account-related fees.
- We also offer investment advisory services which use unaffiliated third-party money managers to assist in managing your assets. You will pay a fee to compensate such unaffiliated third-party money managers which is identified in the account agreement documents that are provided to you prior to entering into a written agreement for such services.
- We may offer financial planning services if we enter into a written agreement with you to provide such services. You will pay a fee for financial planning services which will be disclosed and agreed to by you prior to entering into an agreement with us for such services.
- We and our financial professionals receive a portion of the investment advisory fee you are charged as a form of compensation for our investment advisory services. This creates a conflict of interest in the form of an incentive to encourage retail investors to increase the assets in advisory accounts and to encourage retail investors to agree to a higher management fee.
- For more information about our investment advisory fees, please read our *Firm Brochure*, available on our website at <u>www.msam.net</u>.
- For a full description of advisory account-related fees and costs, please read the Fee Disclosure, available on our website at www.msam.net.

What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment adviser? How else does the firm make money and what conflicts of interest do you have?

Standard of Conduct

When we provide you with a recommendation as your broker-dealer or act as your investment adviser we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask about these conflicts because they can affect the recommendations and investment advice that we provide you. Here are some examples to help you understand what this means.

How do your financial professionals make money?

We and our financial professionals receive a portion of the fees that you pay when you invest with us. When we provide brokerage services, we and our financial professionals receive a portion of the transaction-based fees you pay. When we provide investment advisory services, we and our financial professionals receive a portion of the advisory fee you pay.

Conversation Corner

Questions you might wish to ask when considering our services:

- How might your conflicts of interest affect me, and how will you address them?
- As a financial professional, do you have any disciplinary history? For what type of conduct?
- Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Whom can I talk to if I have concerns about how this person is treating me?

We also receive compensation from third parties including investment product sponsors, clearing firms and/or their affiliates, mutual fund companies and insurance companies whose products we sell. For example, in certain circumstances, investment product sponsors pay compensation to the clearing firms we work with and/or their affiliates and a portion of such compensation is shared with us. Additionally, certain mutual fund and insurance companies make ongoing payments to us, our financial professionals, and/or the clearing firms we work with, commonly known as trails, service fees or 12b-1 fees. If paid to a clearing firm and/or its affiliates, a portion of such compensation is shared with us. In addition, certain mutual fund and insurance companies pay us and/or the clearing firms we work with, additional amounts known as revenue sharing. If revenue sharing compensation is paid to a clearing firm, the clearing firm shares a portion of such compensation with us, subject to our agreement with the clearing firm.

Certain mutual fund companies have entered into networking agreements and shareholder accounting agreements with clearing firms and/or their affiliates to provide certain services for the mutual fund companies and pay the clearing firm and/or its affiliates additional amounts known as shareholder accounting and/or networking fees. If such compensation is paid to a clearing firm and/or its affiliates, a portion of such compensation is shared with us, subject to our agreement with the clearing firm. We also receive compensation from clearing firms and/or their affiliates based on a percentage of customer balances held in cash sweep accounts and customer margin balances, or borrowed in credit products, subject to our agreement with the clearing firm. In certain instances, we receive payments from investment product partners in the form of re-allowance fees. The amount of compensation we receive from investment product sponsors varies from product to product and is described in the investment's disclosure documents, such as the prospectus, offering document or investment contract. In some instances, we receive payments from investment product partners for training and education or to help defray the expenses of our leadership summits and/or annual compliance meetings.

The way we are compensated by you and other sources creates some conflicts between our interests and yours. For example, our compensation creates conflicts of interest when providing advice on rollovers or transfers, withdrawals, discounts, margin loans, trades, investment types, and cash sweep services. Our compensation also creates conflicts of interest when helping you choose one investment over another, or one service over another, such as choosing between brokerage or advisory services.

We are committed to taking appropriate steps to identify, mitigate and, in some instances, avoid conflicts of interest, to ensure that we act in your best interest when providing investment recommendations and services to you. For more information about our compensation and the conflicts of interest that relate to our brokerage services, please read our *Regulation Best Interest Disclosure*, available at <u>www.moseco.com</u>. For more information about how we and our financial professionals are compensated for advisory services, please read our *Program Brochures*, available at <u>www.msam.net</u>. You can also read more about the SEC's Regulation Best Interest regulations at <u>www.investor.gov</u>, a website maintained by the SEC.

Do you or your financial professionals have legal or disciplinary history?

Yes. We and certain financial professionals have legal or disciplinary history. For information about legal or disciplinary history concerning us and our financial professionals, please visit <u>www.lnvestor.gov/CRS</u>, contact your financial professional, contact our office at 314.909.0600, visit our broker-dealer's website at <u>www.moseco.com</u>, or visit our investment adviser's website at <u>www.msam.net</u>.

Where can I find additional information?

For additional information or to request a copy of this Customer Relationship Summary, please contact your financial professional, contact our office at 314.909.0600, visit our broker-dealer's website at <u>www.moseco.com</u>, or visit our investment adviser's website at <u>www.msam.net</u>.