

First Palladium is registered with the Securities and Exchange Commission (“SEC”) as a broker-dealer and is a member of FINRA. Our firm distributes insurance and annuities on behalf of insurance companies. Your financial professional works with First Palladium to provide you with access to certain insurance products and solutions to help achieve your unique insurance needs.

We are providing this relationship summary to help you better understand the ways First Palladium and our financial professionals may serve you and to summarize the products and services we provide. Free and simple tools are available to research firms and financial professionals. Visit <https://www.investor.gov/CRS> for tools and education material about broker-dealers and investing.

## What investment services and advice can you provide me?

First Palladium is a limited broker-dealer that offers variable life insurance, variable annuities, registered index-linked annuities and variable linked benefit. These types of annuities and insurance are considered securities because they offer investment choices in their sub-accounts and/or they are registered with the SEC. First Palladium and its financial professionals must have a reasonable basis for believing any recommendation or investment strategy made to you is suitable, in your best interest, and appropriate for you, given your individual financial circumstances, needs, and goals.

For additional information, please ask your financial professional:

- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do these mean?

- **Insurance Platform.** We do not offer or sell other types of securities. This could be considered a material limitation of our firm. You will need to engage a different broker-dealer if you are interested in investments other than securities-based insurance products. While we offer a wide range of securities-based insurance products from multiple insurance companies, we do not offer every such product. This means that our financial professionals are limited to recommending only those products First Palladium has determined to put on its platform. First Palladium does not view this fact alone as a material limitation, but it may become so depending on the facts and circumstances of each customer situation.
- **Monitoring:** While we may monitor the insurance aspects of a policy or annuity, we do not monitor ongoing suitability or the investment components of a variable contract, leaving that to clients or their investment advisors. We do not provide contractual or agreed-upon account monitoring, nor do we offer explicit or implicit instructions to sell or hold an investment.
- **Investing Authority.** First Palladium does not accept discretion. We have limited authority at such time that you accept one of our recommendations, or when you or your investment advisor (if applicable) instruct us to take action.
- **Account Minimums.** We do not currently have any account minimums or other requirements to open or maintain an account relationship; however, insurance companies may have minimums which can vary by product.

Your First Palladium financial professional may also offer and sell other insurance products that are not securities, such as fixed annuities, fixed indexed annuities, universal life, whole life, term life, and indexed universal life (collectively defined as “fixed insurance”). The sale of fixed insurance is considered outside business activities (“OBA”) in relation to First Palladium. An OBA is an activity approved by First Palladium and is carried-out independently of First Palladium. The duties and obligations that First Palladium has under the SEC’s Regulation Best Interest do not extend to transactions in fixed insurance executed as an OBA. Please contact your financial professional for the standards he or she has when selling fixed insurance.

## What fees will I pay?

**Commissions and Fees.** Insurance companies pay us commissions, asset-based fees, and/or other fees for administrative or distribution services (“compensation”) upon the sale of an insurance or annuity contract, depending on each transaction. Such compensation generally is priced into the product you purchase. For additional information, please see First Palladium’s Disclosures at <https://www.ashbrokerage.com/pages/legal>.

For additional information, please ask your financial professional:

- Help me understand how these fees and costs might affect my investments.
- How are fees determined?

**Costs and Expenses.** Insurance products include certain fees for the cost of insurance and other fees insurance companies may charge. 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. In addition, additional fees and costs may be charged by insurance companies for the inclusion of certain benefits and riders. Surrender charges also may be incurred by you for not holding your contract for a specified period of time. Tax penalties may be incurred for withdrawing from the contract before age 59 ½. Please make sure you understand the fees and costs you pay, including reviewing the prospectus of the insurance contract you are considering. For additional information, please see First Palladium’s Disclosures at <https://www.ashbrokerage.com/pages/legal>.

## How do your financial professionals make money?

For the employees of First Palladium's parent company, these financial professionals are paid a salary and may receive additional compensation. Depending on the team servicing the customer, this additional compensation is based on either (a) a predetermined formula or (b) meeting minimum revenue goals and then at the discretion of senior leadership, taking into account, among other things, the employee's role, contribution to the business, and client satisfaction. For financial professionals who are not employees of the firm or its parent company, they receive a large percentage of the commissions the firm receives on the sale of insurance products. For additional information, please see First Palladium's Disclosures at <https://www.ashbrokerage.com/pages/legal>.

## What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation, 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. Compensation based on insurance transactions inherently are conflicts of interest since they are dependent upon you purchasing a life insurance policy or annuity. You should understand these conflicts because they can affect the recommendation provided to you.

For additional information, please ask your financial professional:

- How might your conflicts of interest affect me, and how will you address them?

- While compensation is generally the same among similar products of various insurance companies, it can differ, which may result in higher compensation on some products than others. In addition, compensation can differ among the same insurance company due to certain factors, such as the length of a contract or whether the product is commission-based or fee-based. IRA rollovers also may be considered a conflict since we make money contingent upon the transfer of your assets into a product we offer. To mitigate these conflicts, First Palladium and your financial professional must have a reasonable basis for believing any recommendation or investment strategy made to you is suitable, is in your best interest and appropriate for you, given your individual financial circumstances, needs, and goals.
- Insurance companies may pay cash and non-cash compensation to First Palladium or its parent company (an insurance general agency) which may consist of marketing allowances to support our platform, occasional business travel, and entertainment for firm personnel or financial professionals, compliance guidance, and product education. We mitigate this conflict by keeping this cash and non-cash compensation independent of the sale of any specific product or to the sales made by any individual financial professional.

For additional information about our conflicts, please see First Palladium's Disclosures at <https://www.ashbrokerage.com/pages/legal>.

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

For additional information, please ask your financial professional:

- As a financial professional, do you have any disciplinary history?
- For what type of conduct?

No for our firm. None of our representatives who work directly with retail clients have a reportable event; however, some of our representatives who work in a wholesaling capacity do. To learn more, visit <https://www.investor.gov/CRS> for a free and simple search tool to research our firm and financial professionals.

## Additional Information

You may request up-to-date information about our firm and services and request a copy of this relationship summary by calling (260) 478-0607. You may also download this relationship summary at <https://www.ashbrokerage.com/pages/legal>.

For additional information, please ask your financial professional:

- Who is my primary contact person?
- Who can I talk to if I have concerns about how this person is treating me?