# Harvest Financial Corporation Regulation Best Interest Disclosures and Fees

Regulation Best Interest (Reg BI) requires broker-dealers, registered investment advisors and their affiliated financial professionals to deliver the Client Relationship Summary (Form CRS) and additional disclosures to clients. Reg BI requires firms to demonstrate that they are acting in the best interest of their clients by meeting standards of conduct. When you establish a relationship through our broker-dealer or registered investment advisor, you have options as to what investment products to use and where they are held. Harvest Financial Corporation ("we", "us" or "Harvest") utilizes RBC Correspondent Services ("RBC") as its custodial and clearing firm for brokerage accounts. For Investment advisory accounts we utilize RBC or Schwab Institutional Services ("Schwab) to custody and execute trades. We also use various Mutual Fund and Variable Insurance Companies to assist our brokerage clients in meeting their investment objectives. Whether we are acting as a broker-dealer or registered investment advisor, we must provide to retail customers a full and fair written disclosure of all material facts relating to the scope and terms of the relationship.

Harvest Financial Corporation is registered as a broker-dealer with the U.S. Securities and Exchange Commission ("SEC") and as an investment advisor with the Commonwealth of Pennsylvania and the states of California and Ohio. We are a member of the Financial Industry Regulatory Authority (FINRA), whose website is <a href="www.finra.org">www.finra.org</a> and the Securities Investor Protection Corporation (SIPC), whose website is <a href="www.sipc.org">www.sipc.org</a>. Although many of our financial professionals offer both brokerage and investment advisory services, some may offer only brokerage services and others may offer only investment advisory services. When you are discussing services with your Harvest financial professional, please ask in which capacity the financial professional is acting or will be acting, either as a broker/dealer registered representative and/or an investment advisor representative, when providing services to you.

This document summarizes the important information concerning the scope and terms of the brokerage services that we offer and details the material conflicts of interest that arise through our delivery of brokerage services to you. For more information on the distinctions between our brokerage and advisory services, please review the Customer Relationship Summary (Form CRS) which can be found on our website: <a href="https://www.harvest-financial.com">www.harvest-financial.com</a>. You may also find additional information about our advisory services (Form ADV) also may found on our website.

We endeavor to make certain that our clients are informed about the various investment products, services and relationships that we offer. There are thousands of investment products on the market and Harvest does not offer all of them for sale to our clients. Additionally, the scope of products and services that we offer may be more limited than what is offered through other financial services firms. Harvest and its financial professionals offer recommended investment products only from investment sponsors with whom Harvest has entered into selling and distribution agreements. Other firms may offer products and services that are not available through Harvest, which creates a conflict since you are not able to purchase those products or services through Harvest. We disclose this conflict to you and mitigate it by providing a varied and vast offering of products and services. We encourage you to review the following information carefully, as well as any additional information, such as account agreements, prospectuses and other disclosure documents that you may receive from us.

A description of the disclosures associated with each type of account relationship is described as follows:

# I. RBC Correspondent Services

When you open a brokerage account with us, your account will be held at RBC Correspondent Services ("RBC"), which acts as our custodial and clearing firm. All trade confirmations, statements, checks

and/or distributions from your accounts will come from RBC. If you wish to make a deposit into your account, the funds will be endorsed and deposited to RBC. You may send checks to our offices, but the deposit will be made to your account at RBC.

Our brokerage services include buying and selling securities (e.g., stocks, various mutual funds, bonds, CDs, UITs) at your discretion. We can also provide clients with financial tools and investor education.

Although there is no minimum account size requirement to open or maintain an account or establish a relationship, some investment products such as mutual funds do require a minimum purchase amount and the purchase of bonds generally are in dollar size increments.

When acting in our capacity as a broker-dealer, we make investment recommendations to you, including a recommendation to open or transfer assets to a brokerage account. When making such a recommendation to you, we do not have a fiduciary obligation to you but we must act in your best interests at the time we make the recommendation without placing our financial or other interests ahead of yours. We do not actively monitor your brokerage accounts. Harvest may voluntarily review the Client's financial situation and holdings for the purpose of determining whether to provide a recommendation to client. Clients will receive account statements at least on a quarterly basis in paper form directly sent from RBC or in electronic form using a secure login to RBC. We encourage you to regularly monitor the investments in your brokerage account. If you prefer ongoing monitoring of your account or investments, you should speak with your Harvest financial professional about whether an advisory services relationship (fee-based) is more appropriate for you.

When you engage Harvest in a brokerage/commission basis, we may make recommendations or you may select your own investments. We are obligated to ensure that our recommendations to you are in your best interest based on your stated investment objective, risk tolerance, tax status, liquidity needs, time horizon and any other financial information you may provide to us. The ultimate investment decisions for your investment strategy and the purchase or sale of investments will be yours. You may accept or reject any of our recommendations. We encourage you to carefully consider your investment objectives and risk tolerance before accepting the recommendations we may offer to you. You are responsible for reviewing your account and investments to make sure your investment mix is appropriate for you and for deciding whether to follow our investment recommendations. Please let us know immediately if your circumstances, investment objectives or risk tolerance change so that we may update your client profile and we may make customize our recommendations based on these changes.

Occasionally, we may provide you with additional information or resources to assist you with managing your brokerage account, including, but not limited to, educational resources, sales and marketing materials, periodic brokerage account reviews, performance reports, and asset allocation guidance. When we offer these services and information, we do so as a courtesy to you. They are not designed to monitor specific investment holdings in your brokerage account, they do not contain specific recommendations and you should not consider them a recommendation to trade or hold any particular securities in your brokerage account. Upon your request, we may review such information and reports with you and may provide you with investment recommendations, but we are not under a specific obligation to provide advice or reporting.

Clients considering a rollover of assets from a retirement plan into an IRA at Harvest should compare the costs associated with their current retirement plan with those incurred in an IRA. The costs associated with an IRA account with Harvest may vary based on a brokerage or advisory relationship. An analysis of the rollover will be completed by Harvest to compare the various factors and considerations regarding the decision.

### Commissions and Fees

<u>Equity Transactions.</u> When you buy or sell equity securities (stocks, ETFs, preferred stock, etc.) in your account, you will pay a commission, charged by RBC. The commission is generally between 1%-5% of the valuation of the securities purchased or sold with a minimum of \$50.00. The number of shares purchased or sold and the market value per share are factors determining the total commission amount. RBC charges Harvest a 'clearing cost' for the trade execution against the commission amount. Harvest receives the remaining portion of the commission as compensation and, ultimately, your registered representative is paid a percentage of the compensation.

<u>Fixed Income Transactions.</u> When you purchase or sell certain fixed income products, the transaction may be executed on an agency basis (directly through RBC) or on a riskless principal basis. An agency trade will have a commission charge. A riskless principal transaction is one in which a fixed income product is purchased or sold into the trading account of Harvest from the open market (another broker-dealer) and then the price is marked up or down and allocated to your account. The 'mark up' or 'mark down' is retained by Harvest as compensation and your registered representative is paid a percentage of this compensation.

### Mutual Fund Transactions:

There is no minimum account size, although initial transactions may require a minimum dollar amount depending on the fund. When you purchase a mutual fund you pay a sales charge, also referred as a sales load.

Please refer to each fund prospectus for specific sales charges which can be up to 5.75% for equity mutual funds at the lowest breakpoint. Breakpoint discounts are volume discounts to the sales charge you pay when purchasing a mutual fund. The amount of the discount depends on the amount invested in a particular family of funds. While not limited to, most advisors will primarily recommend A Shares within brokerage commission-based accounts. In some cases, C shares will be recommended if the account size, expected holding period along with other factors make C shares the prudent share class for purchase.

Mutual fund companies and 529 plans pay Harvest ongoing distribution and/or service fees often known as 12b-1 fees. You pay 12b-1 fees to the mutual fund company as one of the ongoing internal costs of holding the shares. These fees generally range between 0.25% and 1.00%, depending on the fund and share class. For some fixed income mutual funds they can have a 12b-1 lower than 0.25%.

Please refer to the fund prospectus and ask your Harvest financial professional for more information regarding the different fees and expenses related to each share class. You may also refer to the Mutual Fund Expense Analyzer offered by FINRA located at: <a href="http://tools.finra.org/fund\_analyzer/">http://tools.finra.org/fund\_analyzer/</a>

### Additional Fees Charged by RBC.

Please see the attached client fee listing as of April 1, 2020 for a complete list of fees. For advisory accounts at RBC and Charles Schwab trading commissions/trading costs, annual account fees and annual IRA fees are covered by the bundled advisory fee.

### II. Mutual Funds – Directly Held

Mutual funds may also be owned via a direct purchase with the product sponsor (as opposed to holding in a brokerage account as described above). These fund holdings are considered to be "directly held," as they are held at the mutual fund company. With a directly held mutual fund account, Harvest purchases the investment directly with the fund sponsor for you by submitting your application and

payment directly to the mutual fund. The fund sponsor is responsible for sending trade confirmations and statements directly to you.

There is no minimum account size, although some specific fund selection may require a minimum initial purchase. See the above disclosure for mutual fund transactions.

In a brokerage account, you can hold several different types of investment securities (such as equities, bonds, UITs, mutual funds, etc.), which can be more efficient since all your securities are included on one statement and you will receive one tax statement each year. With a directly held account, you may only hold those funds or products offered and issued by that specific product sponsor. Brokerage accounts generally have annual maintenance fees and fees for transactions and other services (please refer to the RBC Client Fee Listing). Directly held accounts typically do not charge such fees, which can make directly held accounts less expensive.

Although there are important differences between brokerage and directly held accounts, we do not require your financial professional to open a particular type nor do we offer incentives to our financial professionals to open one type over the other. Please discuss with your Harvest financial professional which method is best for you and your circumstances.

## III. Variable Annuity - Direct Held

Variable annuities are contracts issued by insurance companies into which the buyer makes a lumpsum payment or a series of payments. In return, the insurer agrees to make periodic payments beginning immediately or at some future date. The client pays the premiums to the issuing insurance company.

At the client's direction, the insurer allocates the client's premium payments to investment options, such as sub-accounts (which are similar to mutual funds) or directly into the general account of the insurance company that manages the portfolios. The value of the account during the accumulation phase and the payments after annuitization vary, depending on the performance of the chosen investment options.

Clients purchase the annuity and, depending on the terms and share class of the annuity, pay additional fees such as annual administrative and maintenance fees and investment management fees, which are generally deducted from the annuity contract value. There are also other optional provisions that may be added to an annuity contract to increase or limit benefits the contract may otherwise provide. Please review the annuity application and features carefully to determine what is appropriate for you.

For a new purchase of a variable annuity, these products are purchased by submitting an application, through a Harvest financial professional, directly to various insurance companies. You will receive confirmations and statements on your annuity from the insurance company. The insurance company pays Harvest Financial Corporation a commission that is a percentage of the amount invested. In general, Harvest is paid a commission at the time of the initial purchase and also receives ongoing payments from the insurance company known as trail commissions which may be spread over the life of the annuity. Specific commissions on a new variable annuity purchase differ from company to company. More detailed information may be found in the applicable annuity prospectus or contract or by speaking with your investment professional.

### HOW WE ARE COMPENSATED

We receive direct and indirect compensation with your brokerage account(s). Direct compensation is taken directly from the specific account, such as a commission or sales loads. Indirect compensation is paid in ways other than directly from the account.

Direct payments from clients include commissions charged to clients with the purchase or sale of equities, fixed income products and other investments; markups and markdowns charged to secondary market transactions of fixed income products; and sales loads, commissions or fees for various financial products, such as mutual funds and annuities.

Indirect revenue comes from companies that issue investment products (such as mutual fund and insurance companies) that pay for educational programs and seminars for our financial professionals and clients.

### CONFLICTS OF INTEREST

Conflicts of interest occur as a consequence of our firm's business and relationships with our clients and vendors or product sponsors with whom we conduct our business. We are required by our industry regulations to establish, maintain and enforce written policies and procedures which are reasonably designed to address these conflicts of interest when we make recommendations to you. We are committed to taking the appropriate actions to identify, mitigate and avoid conflicts of interest so that we act in your best interest when we provide brokerage recommendations to our clients.

The following are conflicts of interest that arise as a result of our firm and financial professional compensation system:

Firm and financial professional direct compensation

Harvest and our financial professionals earn compensation when we provide brokerage services to you. The compensation that we and our financial professionals receive from you varies, based upon the product you purchase. This creates a financial incentive to recommend investment products that generate greater compensation or feature on-going residual payments ("trailers"). There is an incentive for financial professionals to recommend products that have these on-going payments as well as those with higher fees.

The payout schedule for our financial professionals increases with their productions levels. As a result, financial professionals have an incentive to provide recommendations for their brokerage clients that would result in selling more investment productions products, creating higher commissions or sales credits. Our compensation schedule may create an incentive for financial professionals to recommend that you buy and sell, rather than hold existing investments.

Brokerage accounts do not feature an on-going fee based on assets under management (unlike an advisory account). If your brokerage account has minimal activity and generates few commissions, your financial professional may be incentivized to recommend you move your brokerage account to an advisory account to generate an on-going revenue source.

The fees charged to investment advisory clients create an unavoidable conflict because we charge for our advice.

Harvest Financial has controls established to identify and mitigate the above potential risks, including excessive trading in client accounts to generate commissions, through our compliance and supervisory policies and procedures regarding on-going client account activity monitoring.

Firm and financial professional non-cash compensation

Often, vendors and product sponsors offer training and educational programs to our financial professionals, which, in some instances, may be a significant expense to them. Although neither Harvest nor our financial professionals receive a portion of the these types of expenses, non-cash compensation, such as occasional gifts (valued at less than \$100), meals, entertainment and

attendance and participation in educational or training forums and the increased exposure to vendors who sponsor these events, may lead a financial professional to recommend the products of those vendors as compared to those vendors who do not provide non-cash compensation or sponsor such events.

Harvest Financial has controls established to identify, monitor and mitigate any potential conflicts regarding non-cash compensation.

Rollovers from an employer-sponsored retirement plan to an IRA account with Harvest

Based on the recommendation of a Harvest financial professional, you may roll over assets of an employer-sponsored retirement plan (such as a profit sharing or defined benefit pension plan, a 401(k) or a 403(b)) upon separation or retirement to an IRA account with Harvest. This creates a conflict of interest for Harvest and its financial professionals due to the financial benefit resulting from the transferring of the plan assets. You should evaluate the investment and non-investment considerations for moving such assets as compared to maintaining your assets in your employer-sponsored retirement plan.

Brokerage accounts vs. advisory accounts (investment advisory services)

In addition to brokerage accounts, you have the option to invest in fee-based advisory accounts. Instead of paying a commission per transaction, in our advisory programs you pay a fee based on the market value of the assets held in your account for investment advisory services that include transaction costs. Our advisory programs offer ongoing account monitoring, which is not available in brokerage accounts, and additional types of investment options and services. When determining which is best for you, consider how much you expect to trade in your account and how much you may pay in commissions (brokerage account) or asset-based fees (advisory account). You will typically pay more in upfront fees and commissions through brokerage services and more over time through investment advisory services. These differences in compensation create a conflict between your investment professional's interest and your own when recommending a program for you. For additional information, please review the ADV Form for the investment advisory programs offered by Harvest.

### GENERAL RISKS AND DISCLOSURES

Although we will take reasonable care in developing and making recommendations to you, securities involve risk and you may lose money. There is no guarantee that you will meet your investment goals or that our recommended investment strategy will perform as anticipated. If you place unsolicited trades (i.e. trades that are based on your own ideas) or trades that are otherwise against our recommendations, this may impact your diversification and the potential range of returns within your account. Please consult available offering documents for any security we recommend to see a discussion of specific risks associated with the product. We can provide those documents to you or help you to find them.

There is always a risk that conditions beyond the control of Harvest and its investment professionals, such as war, terrorism, natural disaster, civil unrest, government restrictions or rulings, interruptions of systems, health issues or labor unrest, may pose a risk to your investments or investment strategies.

The computer systems, networks and devices used by Harvest and our service providers employ a variety of protections which are designed to protect against any interruption or damage from computer viruses, network and computer failures and cyber-attacks. Despite such protections, however, systems, devices and networks may be breached. Cyber incidents may cause disruptions and impact business operations, with potential financial losses, the inability of Harvest or our service providers to trade and make monetary movements, violations of privacy and other laws, regulatory fines,

reputational damage, reimbursement costs and additional compliance costs, as well as the inadvertent release of confidential information.

# WHO TO CALL WITH QUESTIONS

Should you have any questions regarding your brokerage account with Harvest Financial Corporation, please call your financial professional or you may call our main office at 412-391-1466.

# Client Fee Listing as of April 1, 2020



other trade related fee as those fees are disclosed on each trade confirmation. With the exception of fees that are "pass through", "at cost", "prorated", "interest charged", or that provide a range as a guideline, the fee listed is the highest amount that Below is a list of fees that may be charged to your account(s) with Harvest Financial that are custodied at RBC Correspondent Services, a division of RBC Capital Markets, LLC (RBC CS). The list of fees does not include customer handling, commissions or any will be charged for the service provided. Fees may change at any time as permitted by applicable regulations and the terms of the clearing agreement between Harvest Financial and RBC CS.

Fee Name	Total Fee Amount
Account Pledge	\$200.00
Alternative Investment– Transaction fee	\$150.00
Alternative Investments– Maintenance fee	\$100.00
American Depository Receipt (ADR) Pass Through Fee	$Passthrough^1$
Annual Account Fee	\$50.00
Automated Clearing House (ACH) Stop Payment Fee	\$20.00
Bank Wire – Domestic	\$20.00
Bank Wire – Foreign	\$75.00
Cashless Stock Option Exercise	Please refer to the Employee Stock Option Exercise Form
Direct Registration System (DRS) Transfer Fee (Incoming)	\$25.00
Direct Registration System (DRS) Transfer Fee (Outgoing)	\$25.00
Dividends & Reorgs – Coupons Received for Collection (per shell or issue)	\$10.00
Dividends & Reorgs – Charge for Late Instructions on Expiring Items	\$15.00
Duplicate Tax Documents (Paper copies)	\$1.25
Duplicate Confirm (Paper copies)	\$1.25
Duplicate Statement (Paper copies)	\$1.25
Deposit / Withdrawal at Custodian (DWAC) Fee	Ranges from \$25.00 to $\$150.00^2$
Escheatment	\$125.00
Extensions	\$10.00
Globe Tax Basic Services	3% of recovered withheld tax; maximum of \$200 per occurrence³
Investment Access Account Related Fees	Please refer to the Investment Access Account Agreement <sup>4</sup>
Investment Access Annual Account Fee	\$125.00 <sup>5</sup>
Legal Deposit / Transfer	\$60.00
Non-Sufficient Funds (NSF) Fee	\$30.00
Non-Transferable Security Custody	\$2.00 per position, per month

Fee Name	Total Fee Amount
Outgoing IRA ACAT Fee	\$120.00
Outgoing Non-IRA ACAT Fee	\$95.00
Overnight Check	\$10.00
Partial Transfer	\$25.00 per transfer
Physical Certificate Reject Fee	\$200.00
Physical Certificate (Non-DRS Eligible and DRS Eligible Securities)	\$650.00
Prepayment Fee	Interest Charged <sup>6</sup>
Retirement – Custodial Qualified retirement closing fee	\$50.00 + Prorated Annual Fee
Retirement – Custodial Qualified retirement plan annual fee	\$75.00 per employee account + \$5.00 per additional participant
Retirement – Custodial Qualified retirement plan set up fee	\$25.00 per employee account + \$5.00 per additional participant
Retirement – IRA Annual Account Fee	\$35.00
Retirement – IRA Account Closing Fee	\$120.00
Retirement – Self-trusteed plan annual fee (one plan / paired plan)	\$150.00 / \$250.00
Retirement – Self-trusteed plan closing fee (one plan & paired plan)	Prorated Annual Fee
Retirement – Self-trusteed plan set up fee (one plan / paired plan)	\$200.00 / \$300.00
Returned Check	\$30.00
Rule 144 / Restricted Stock Deposit Fee	\$95.00
Safekeeping Fee	\$50.00
Security Transfer Fee – International	\$140.00
Transfer Agent Fees	At Cost
Transfer on Death Account Change Fee	Fee Waived
Transfer on Death Account Distribution Fee	Fee Waived
Transfer on Death Account Set-Up Fee	Fee Waived
Voluntary Non-Physical Reorg	\$40.00
Voluntary Physical Reorg	\$45.00

# Notes:

- ADR pass through fees are outlined in the ADR prospectus.
- DWAC is determined by the transfer agent, but typically ranges from \$25.00 to \$150.00.
- Clients who hold or purchase Canadian, Irish, or Japanese securities are automatically enrolled in this service. Clients may opt-out at any time by contacting their Financial Professional. Global Tax Full Services are also available at an additional cost. Please contact your Financial Professional if you would like to opt-out or sign up for Global Tax Full Services. Fees & jurisdictions covered are subject to change at any time. 3)
  - The Investment Access Account application contains a fee schedule that outlines fees related to an Investment Access Account (checking related fees, wire transfer and ACH fees, and VISA gold check card fees).
  - The annual fee is waived for accounts over \$200,000. 6 5 6
- The calculation to determine the interest is: \$25.00 + (Actual Prepay Amount x Interest Rate x (Days to Settlement) / 360 days)). The interest rate is equal to RBC's Base Lending Rate plus a sliding scale of percentages according to the size of the actual prepay amount. Please contact your Financial Professional for RBC's Base Lending Rate.