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 the brokerage services and investment advisory services described in this Customer Relationship Summary. Brokerage and investment advisory services and fees differ, and it is important that retail investors 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 may benefit financially from commissions, fees, and other payments from you and third parties, such as our investment product providers. These financial incentives may 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 potential conflicts of interest.

Free and simple tools are available for you to use at www.investor.gov, 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 may pay
- 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 advisor'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. We offer these brokerage services and 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. There is no minimum initial account balance required to open 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.

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 (Unified 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 a full description of our brokerage services and fees, please read our *Regulation Best Interest Disclosure*, available on our website at www.moseco.com. For a full description of our brokerage account-related fees, please read the *Fee Disclosure,* available on our website 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 advisor, 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 registered broker-dealer to make investment transactions for our clients and works with our unaffiliated clearing firm, which provides custodial and account-related services for our clients. In most instances, our clearing firm will maintain custody of your assets.

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.adviserinfo.sec.gov and on our 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 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. 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 will pay transaction-based fees each time you make a transaction. For example, you will 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 potential conflict of interest in the form of an incentive to recommend more transactions and to recommend investments which generate higher commissions or compensation.
- For a full description of the transaction-based fees and costs of our brokerage services and investments, please read our *Regulation Best Interest Disclosure* and our *Fee Disclosure*, each available on our website at www.moseco.com.

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 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 an agreement for such services.
- We may offer financial planning services if we enter into an 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 potential 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 www.msam.net.
- 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 interests ahead of your interests. 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 are charged as compensation for our services. When we provide investment advisory services, we and our financial professionals receive a portion of the advisory fee you are charged as compensation for our services.

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

Certain mutual fund companies have entered into networking agreements and shareholder accounting agreements with our clearing firm and/or its affiliates to provide certain services for the mutual fund companies and may pay our clearing firm and/or its affiliates additional amounts known as shareholder accounting and/or networking fees. If such compensation is paid to our clearing firm and/or its affiliates, a portion of such compensation is shared with us. We also receive compensation from our clearing firm and/or its affiliates based on a percentage of customer balances held in cash sweep accounts and customer margin balances. 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 for our services by you and other sources can create conflicts with your interests. We want you to understand that the receipt of the various forms of compensation described above by us and our financial professionals creates a potential conflict of interest in the form of an additional financial incentive and financial benefit to us, our financial advisors and equity owners in connection with our services and sales of certain investment products. Third party payments may be based on the sales of certain investment products, incentivizing us to recommend you buy and sell those products. Opportunities to participate in revenue sharing may also incentivize us to make recommendations of one product over another. We are also incentivized to recommend products with higher trail fees.

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 how we and our financial professionals are compensated for brokerage services, as well as the conflicts of interest that relate to our services and investment products, please read our *Regulation Best Interest Disclosure*, available on our website at www.moseco.com, and for more information about how we and our financial professionals are compensated for advisory services, please read our *Program Brochures*, available on our website at www.msam.net. You can also read more about the SEC's Regulation Best Interest regulations at www.investor.gov, 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 www.Investor.gov/CRS, contact your financial professional, contact our office at 314.909.0600, visit our broker-dealer's website at www.moseco.com, or visit our investment advisor's website at www.msam.net.

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 www.moseco.com, or visit our investment advisor's website at www.msam.net.

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