

Investment Solutions for Company-Sponsored Retirement Plans

Our 3(38) Offering

HCM-Guided Retirement is a service offered by Howard Capital Management, Inc. (HCM) that works alongside advisors and plan sponsors to provide fiduciary support through our 3(38) service and investment models in company-sponsored retirement plans. Our goal is to help you limit your fiduciary liability and responsibility.

Our Fiduciary Obligation

By implementing our service in your plan, Howard Capital Management, Inc. (HCM) will act as the 3(38) investment fiduciary. We provide plan participants access to risk-based, actively managed models. HCM will be responsible for the entire investment process including:

- Responsibility for selecting, replacing, and monitoring fund options based on set standards documented in our Investment Policy Statement
- Providing a math-based custom model solution incorporating the HCM-Buyline®, a proprietary *stoploss* indicator, in an effort to limit downside investment risk to plan participants
- Choice of Custom or Blended Models
- Our models can act as the Qualified Default Investment Alternative (QDIA) and is designed to take participant emotion out of the investing process

Partnering with Us

Our approach is designed to reduce plan sponsor liability from investment related issues while giving plan participants additional opportunities inside their retirement plan.

- The plan sponsor is removed from the investment selection, monitoring, and replacement process
- Howard Capital Management, Inc. (HCM) becomes the investment fiduciary for all investment matters and the plan trustee can concentrate on the day-to-day operations of the plan
- HCM will work closely with the plan advisor and the trustee to inform them of changes or modifications to the fund line-up before any changes are implemented
- Partnering with us gives plan participants access to risk-based models ranging from conservative to aggressive. These models can be chosen by the participant based on their risk tolerance

Our Process

Investment Policy Statement (IPS): A representative from Howard Capital Management, Inc. will provide an Investment Policy Statement outlining our investment selection and monitoring process. Our monitoring process will consider current regulatory environment, capital markets, performance of the investment funds relative to the markets, and utilization of various funds by plan participants. By partnering with HCM-Guided Retirement we can serve as the 3(38) fiduciary on your plan.

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Call

1-800-279-1455

Visit

hcmguidedretirement.com

Contact Us

guidedretirement@howardcm.com

Where

1145 Hembree Road
Roswell, GA 30076

Important Disclosure:

Howard Capital Management, Inc. ("HCM") is registered with the SEC and only transacts business where it is properly registered or is otherwise exempt from registration. SEC registration does not constitute an endorsement of the firm by the Commission, nor does it indicate that the advisor has attained a particular level of skill or ability. The HCM Guided Retirement Solution is a web-based tool intended to help clients invest in their employer's 401(k) or similar defined contribution plan. Clients receive discretionary investment management from the HCM Guided Retirement Solution while maintaining total control over their personal accounts. The goal is to reduce risk by taking proactive measures with company-sponsored retirement plans. Changes in investment strategies, contributions or withdrawals may materially alter the performance, strategy, and results of your portfolio. Different types of investments involve varying degrees of risk, and there can be no assurance that any specific investment (including the investments and/or investment strategies recommended through the HCM Guided Retirement Solution), will be equal to past performance level, equal any corresponding indicated historical performance level(s), be suitable for your portfolio or individual situation, or be profitable for a client's portfolio. Past performance does not guarantee future results. All investment strategies have the potential for profit or loss. Economic factors, market conditions, and investment strategies will affect the performance of any portfolio and there are no assurances that it will match or outperform any particular benchmark for measuring the performance of a portfolio. When HCM provides investment advisory services to a retirement plan qualified under the Employee Retirement Income Security Act of 1974 ("ERISA"), as amended, it does so in its capacity as a "fiduciary," as that term is defined under Section 3(21) of ERISA. When HCM provides these services on a discretionary basis, it does so as an "investment manager," as that term is defined under Section 3(38) of ERISA.

Qualified Default Investment Alternative ("QDIA") General Information

You have the right to select how the assets in your retirement plan account will be invested. You may need to make investment elections upon initial enrollment under the plan, upon a change of investment options under the plan, or upon receipt of a rollover or transfer contribution into your account. If you do not follow the plan's procedures for making investment elections timely, any contributions made to your account will be invested in the plan's qualified default investment alternative ("QDIA") as described below. The allocation of your account will continue in this manner until you advise the Plan Administrator otherwise. The Plan Administrator will provide you with information on the plan's procedures for making investment elections, including other investment alternatives available under the plan. Participants retain the right to change or alter their investment elections at any time, and will not incur any additional restrictions, fees, or expenses as a result of doing so.

Plan Default Process

In the event no affirmative election on how your money is to be invested is received, your plan assets will be mapped to the Moderate Growth custom model as the QDIA. Without an affirmative investment election, subsequent elective contributions will also be defaulted into the QDIA. All participants will be given the option during conversion process to opt out of the QDIA and select their own investments and will remain free to change or update their investment elections after the conversion is completed. In the event of the death of the participant, and after the account has been turned over to the account beneficiary(ies), such beneficiary(ies) will have the option to direct the investments and move the assets from the QDIA into any investment they select.

Investment Information

The Moderate Growth model is a discretionary asset allocation model managed by Howard Capital Management, Inc. ("HCM"), an SEC-registered investment adviser. In managing the discretionary models, including the Moderate Growth model, HCM acts as a fiduciary and an investment manager, as those terms are defined under Sections 3(21) and 3(38), respectively, or the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). HCM receives a flat asset-based fee for its model management services, and this will include the creation and maintenance of the Moderate Growth model. There are no additional fees for investments in the HCM-managed custom models.

Moderate Growth' Model: HCM actively manages this strategy by using a systematic, non-emotional methodology. Trend analysis is used to decide when to move away from securities and into cash and cash equivalents. During positive market trends, the equity portion of this strategy seeks to participate in broad-based indexes and sectors. Multiple indicators are monitored to identify developing trends in the markets. The bond portion of this strategy typically seeks to participate in domestic markets and sectors (but may on occasion trade global funds) using a strategy that rotates among short-, medium-, and long-term bonds; high-yield bonds; corporate bonds; and treasuries. The portfolio is rebalanced periodically, and it is possible for the allocation to be adjusted when the HCM-BuyLine® indicates a strengthening or weakening in the equity markets. Target Allocation (Equity/Bond): 50/50.

Please Note: Information regarding risk and return characteristics, and fees and expenses, of the Moderate Growth custom model QDIA, can be found in the enclosed fact sheet. Past performance may not be indicative of future results. Moreover, no current or prospective Plan participant should assume that future performance of any specific investment, investment strategy, or product made reference to directly or indirectly in any general informational materials or educational sessions (including the plan investment alternatives), will be profitable or equal any corresponding indicated historical performance level(s). Different types of investments involve varying degrees of risk, and there can be no assurance that any specific investment will either be suitable or profitable for a participant's retirement portfolio. You have the right to transfer the assets invested in the default investments to any other investment alternative available under the plan. You may transfer assets from default investments on a daily basis. You may obtain additional information on all available plan investments by logging into your account on the plan website. Also, if you want additional investment information, to ask any questions about how the plan works or your rights and obligations under the plan, or if you want a copy of the plan's Summary Plan Description (SPD) or other plan documents, please contact the Plan Administrator.

HCM Buy-Line® Indicator. The HCM-BuyLine® (the "Indicator") is a proprietary indicator used to assist in determining when to buy and sell securities. When the Indicator identifies signs of a rising market, HCM then identifies the particular security(ies) that HCM believes have the best return potentials in the current market from the universe of assets available in each given model and signals to invest in them. When the Indicator identifies signs of a declining market, the Indicator signals to move clients' investments to less risky alternatives. Not every signal generated by the Indicator will result in a profitable trade. There will be times when following the Indicator results in a loss. An important goal of the Indicator is to outperform the market on a long-term basis. The reason is the mathematics of gains and losses. A portfolio which suffers a 30% loss takes a 43% gain to return to the previous portfolio value. The Indicator is reactive in nature, not proactive. It is not designed to catch the first 5-10% of a bull or bear market. Ideally, it will avoid most of the downtrends and catch the bulk of the uptrends. There may be times when the use of the Indicator will result in a loss when HCM re-enters the market. Other times there may be a modest positive impact. When severe downtrends occur, however, such as in 2000-2002 and 2007-2008, the Indicator has the potential to make a significant difference in portfolio performance. Naturally, there can be no guarantee that the Indicator will perform as anticipated. The Indicator does not generate stop-loss orders that automatically sell securities in the portfolio at a certain price. As a result, use of the Indicator will not necessarily limit your losses to the desired amounts due to the limitations of the Indicator, market conditions, and delays in executing orders.

The HCM Guided Retirement Program is an optional service. Information on annual fees is located on the plan sponsor's disclosures. Termination of this service does not reverse actions taken in the past by the HCM Guided Retirement Program. LASS.GR.CMA.0921

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