



HOWARD
Capital Management



IS YOUR 401(k) WORKING JUST AS HARD AS YOU ARE?

ACTIVE + RISK MANAGEMENT

Howard Capital Management, Inc. (HCM) actively manages the below self-directed brokerage (SDBA) account by using a systematic, non-emotional methodology. These portfolios can invest in all areas of the market and specific sectors in attempt to identify the best allocation per investor. Programs are managed for investors of all risk tolerance preferences in the Growth, Balanced and Conservative models, and can go up to 100% cash or cash equivalents within its equity position to minimize loss in a market downturn by utilizing the HCM-BuyLine®.

GROWTH OF A \$200,000 INVESTMENT (INCEPTION OF 4/1/2015 TO 4/30/2024) USING THE FOUR HCM SELF-DIRECTED BROKERAGE ACCOUNT ALLOCATIONS

HCM FUNDS
AGGRESSIVE
(SDBA)

S&P 20%
HFRX 80%

HCM FUNDS
GROWTH
(SDBA)

S&P 20%
BARCLAY 20%
HFRX 60%

HCM FUNDS
BALANCED
(SDBA)

S&P 5%
BARCLAY 35%
HFRX 60%

HCM FUNDS
CONSERVATIVE
(SDBA)

S&P 5%
BAR 55%
HFRX 40%

\$195,020	2015	\$193,120
\$234,979	2016	\$197,774
\$292,877	2017	\$222,060
\$260,133	2018	\$203,451
\$319,729	2019	\$233,317
\$446,885	2020	\$250,535
\$618,086	2021	\$288,992
\$422,647	2022	\$271,334
\$524,589	2023	\$300,149

**\$224,440 MORE
THAN THE BENCHMARKS**

\$196,600	2015	\$194,540
\$233,875	2016	\$200,356
\$282,474	2017	\$222,274
\$252,927	2018	\$207,892
\$307,483	2019	\$237,662
\$425,679	2020	\$257,078
\$567,430	2021	\$289,032
\$398,108	2022	\$266,458
\$488,876	2023	\$294,835

**\$194,041 MORE
THAN THE BENCHMARKS**

\$197,500	2015	\$194,060
\$230,956	2016	\$197,281
\$273,567	2017	\$213,576
\$247,413	2018	\$201,039
\$297,860	2019	\$223,253
\$412,506	2020	\$237,831
\$533,659	2021	\$256,762
\$378,417	2022	\$238,942
\$463,333	2023	\$257,818

**\$205,515 MORE
THAN THE BENCHMARKS**

\$198,900	2015	\$195,440
\$228,894	2016	\$199,700
\$262,587	2017	\$213,599
\$240,058	2018	\$205,120
\$285,356	2019	\$226,985
\$392,564	2020	\$243,214
\$484,895	2021	\$255,861
\$353,150	2022	\$233,704
\$427,982	2023	\$252,189

**\$175,793 MORE
THAN THE BENCHMARKS**

A self-directed brokerage account (SDBA) is an option available within some company-sponsored retirement plans that allows participants to invest in outside investments beyond the menu of designated investments offered by the company's 401(k), 403(b) and/or 457 plan. Often referred to as a brokerage window, SDBAs provide participants a "window" to choose from additional investment options such as corporate stock, mutual funds, bonds, exchange-traded funds, and/or options. SDBAs made available for Howard Capital Management (HCM) services may include, or be limited to, HCM's proprietary mutual funds and/or exchange-traded funds.

Howard Capital Management, Inc. | 1145 Hembree Road | Roswell, GA 30076 | (770) 642-4902 | info@howardcm.com | www.howardcm.com

All investment approaches have the potential for loss as well as gain. There is no certainty that any investment or strategy (including the investments and/or investment strategies recommended by the advisor), will be profitable or successful in achieving investment objectives. Please work with your financial professional to determine which investment program is consistent with your financial objectives and risk tolerance.

SDBA MODEL OVERVIEW DISCLOSURES

A self-directed brokerage account (“SDBA”) within a retirement plan account allows participants to invest their self-directed retirement plan account balances in a variety of investments beyond the menu of designated investment alternatives offered directly by the plan. SDBAs are sometimes referred to as “self-directed brokerage windows.” A SDBA provides participants with the ability to choose from among additional investment options, which can include corporate stock, mutual funds, bonds, exchange traded funds, and/or options. SDBAs made available for HCM services may include, or be limited to, HCM’s proprietary mutual funds and/or exchange-traded funds. HCM may also make HCM-managed investment models available for participant investment under SDBA engagements, and these models may similarly be comprised in whole or in part by HCM’s proprietary funds.

HCM’s SDBA model strategies typically seek to participate in all markets and sectors by investing the portfolio in sectors which HCM’s Proactive Section Rotation (PSR) methodology indicates to have the potential to meet performance objectives. PSR is a tactical asset allocation methodology, which attempts to identify the best performing sectors at a given point in time. The SDBA strategies utilize the HCM-BuyLine® proprietary indicator to monitor market conditions and assist in determining whether or not assets should be invested in equity products or moved to cash, cash equivalents, or bond funds. Multiple indicators are monitored in an effort to identify such trends in the equity markets. The strategy is rebalanced periodically, and it is possible for the allocation to be adjusted, including when the HCM-BuyLine® indicates a strengthening or weakening of the equity markets. The net asset value per share of this HCM program will fluctuate as the value of the securities within the portfolio change. Because this Howard Capital Management, Inc. (HCM) strategy is actively managed, it may experience above-average turnover, which could increase transaction costs and have a negative impact on account performance. Naturally, there can be no guarantee that the HCM-BuyLine® indicator will perform as anticipated. HCM-BuyLine® does not produce an actual stoploss order that automatically sells securities in the portfolio at a certain price. Stoploss signals will not necessarily limit your losses to the desired amounts due to the limitations of the HCM-BuyLine®, market conditions, and delays in executing orders.

This presentation includes a comparison of the performance of various SDBA models against comparative benchmarks. While performance information related to each SDBA model contained herein is based on actual historical performance of that model, it does not reflect the performance of any particular client account. Accordingly, SDBA model performance measures shown are hypothetical, should not be viewed as indicative of the manager’s skill, and do not reflect actual returns achieved by any particular client. Model performance results have inherent limitations, particularly the fact that these results do not represent actual management client accounts and may not reflect the impact that material economic and market factors might have placed on the adviser’s decision-making when managing actual client assets.

Comparative Benchmark. Aggressive- S&P 500 Monthly Reinvested Index (20%), HFRX Equity Hedge Index (80%). Growth-. S&P 500 Monthly Reinvested Index (20%), HFRX Equity Hedge Index (60%), Barclays Capital US Aggregate Bond TR Index (20%). Balanced- S&P 500 Monthly Reinvested Index (5%), HFRX Equity Hedge Index (60%), Barclays Capital US Aggregate Bond TR Index (35%). Conservative- S&P 500 Monthly Reinvested Index (5%), HFRX Equity Hedge Index (40%), Barclays Capital US Aggregate Bond TR Index (55%). S&P 500 Reinvested is a gauge of the large cap U.S. equities market. The index includes 500 leading companies in leading industries of the U.S. economy, capturing 75% coverage of U.S. equities. S&P 500 Reinvested assumes dividends are reinvested. Visit <http://www.standardandpoors.com/indices> for more information regarding Standard & Poor’s indices. HFRX Equity Hedge Index is constructed using a UCITSIII compliant methodology, which is based on defined and predetermined rules and objective criteria to select and rebalance components to maximize representation of the Hedge Fund Universe. HFRX Indices utilize quantitative techniques and analysis, multi-level screening, cluster analysis, Monte-Carlo simulations and optimization techniques to ensure that each Index is a pure representation of its corresponding investment focus. Full strategy and regional descriptions (multi-language), as well as the full “HFRX Hedge Fund Indices Defined Formulaic Methodology” may be downloaded at www.hfrx.com. Barclays Capital US Aggregate Bond TR Index is a broad-based benchmark that measures the investment grade, US dollar-denominated, fixed-rate taxable bond market, including Treasuries, government-related and corporate securities, MBS (agency fixed-rate and hybrid ARM passthroughs), ABS, and CMBS. The US Aggregate rolls up into other Barclays Capital flagship indices such as the multi-currency Global Aggregate Index and the US Universal Index, which includes high yield and emerging markets debt. The US Aggregate Index was created in 1986, with index history backfilled to January 1, 1976. Total Return (TR) assumes yield is reinvested. Visit <https://ecommerce.barcap.com/indices> for more information regarding Barclays Capital indices. Indices are unmanaged investment measures and are not available for investment purposes.

Investment indexes and benchmarks are unmanaged investment measure and are not available for investment purposes. Historical performance results for investment indexes have been provided for general comparison purposes only. Index performance generally does not reflect the deduction of transaction and/or custodial charges or the deduction of an investment management fee, the inclusion of which would have the effect of decreasing historical index performance results. There are no assurances that an SDBA portfolio or strategy will match or outperform any particular benchmark.

SDBA data in this report has been distributed for informational purposes only and should not be considered as investment advice or a recommendation of any particular security, strategy or investment product. No part of this material may be reproduced in any form, or referred to in any other publication, without express written permission of Howard Capital Management, Inc.

Howard Capital Management, Inc. (“HCM”) is an SEC-registered investment advisor with its principal place of business in the State of Georgia. SEC registration does not constitute an endorsement of HCM by the SEC, nor does it indicate that HCM has arraigned a particular level of skill or ability. HCM only transacts business where it is properly registered or is otherwise exempt from registration. This presentation is limited to the dissemination of general information pertaining to its investment advisory/management services. Any subsequent, direct communication by HCM with a prospective client shall be conducted by a representative that is either registered or qualifies for an exemption or exclusion from registration in the state where the prospective client resides. For information pertaining to the registration status of HCM, please contact HCM or refer to the Investment Advisor Public Disclosure web site (www.adviserinfo.sec.gov). For additional information about HCM, including fees and services, send for our disclosure statement as set forth on Form ADV from us using the contact information herein. Please read the disclosure statement carefully before you invest or send money. All investment approaches have the potential for loss as well as gain. There is no certainty that any investment or strategy (including the investments and/or investment strategies recommended by the advisor), will be profitable or successful in achieving investment objectives. Please work with your financial professional to determine which investment program is consistent with your financial objectives and risk tolerance.