

Self-Directed Brokerage Accounts



HOWARD
Capital Management

Investor Profile

Available to investors with eligible 401(k), 403(b) and/or 457 retirement accounts¹.

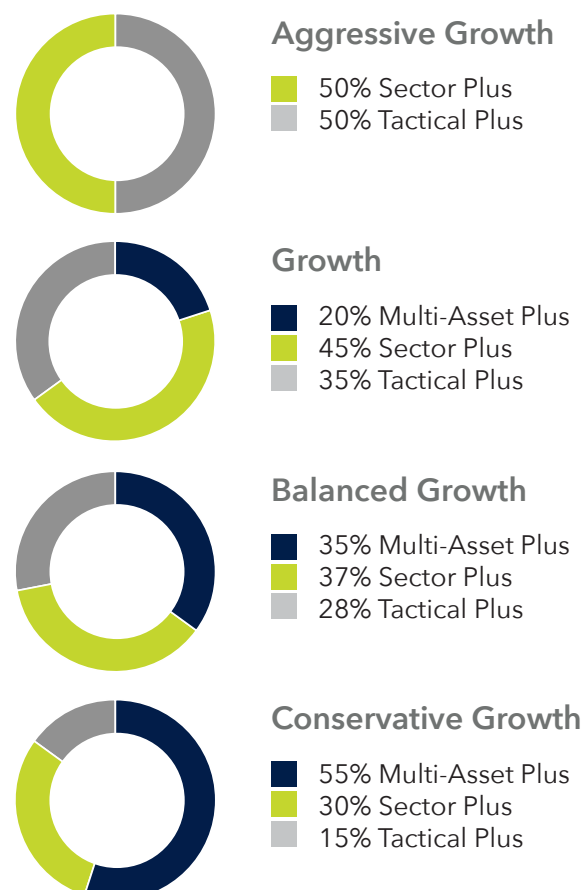
Methodology

Employing a blended and unconstrained strategy, the portfolio targets investments selected for their potential to meet its risk/return objectives.

SDBA Highlights

- Multiple target allocations of proprietary Mutual Funds for varying risk/return objectives.
- Active management and periodic rebalancing
- SDBA windows available through multiple custodians and retirement plans²
- Access to proprietary trend indicators HCM-BuyLine® and HCM Pivot Points®
- Funds can shift up to 100% cash/equivalents

Target Allocations³



Comparative Benchmark

	S&P 500 Reinvested	HFRX Equity Hedge Index	Bloomberg US Aggregate Bond TR Index
Aggressive	20%	80%	-
Growth	20%	60%	20%
Balanced	5%	60%	35%
Conservative	5%	40%	55%

Available Platforms

Alight, Charles Schwab PCRA, Empower, Fidelity, TIAA².

¹Please check with your HCM representative for additional availability. ²Please check with your Retirement Plan Sponsor to determine SDBA eligibility and if an SDBA window is offered to participants through the plan. Subject to availability. ³The charts above represent an approximate percentage of investment choices for each model and should not be considered a guarantee or fixed percentage. May vary at manager's discretion. There can be no guarantee that the HCM-BuyLine® or HCM Pivot Points® will perform as anticipated. Investing comes with risk, including the risk of loss. HCM cannot guarantee success of any investments. Investments and investment recommendations made by HCM may result in losses.

IMPORTANT DISCLOSURE INFORMATION

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 may potentially employ HCM's Proactive Sector Rotation methodology, which seeks to participate in all markets and sectors and 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 HCM-BuyLine® is a tactical proprietary indicator used to assist in determining when and how much to invest in equities. The HCM-BuyLine® is not an automated trading program, and not all HCM-BuyLine® signals will result in securities transactions. When the HCM-BuyLine® indicates a bull market, the firm identifies the particular mutual funds, ETFs, or individual securities that it believes have the best return potential in the current market from the universe of assets available in each given program and increases investment exposure to them. When the HCM-BuyLine® indicates a bear market, the firm moves clients' investments to less risky alternatives, which may include cash, cash equivalents, and short-term bonds. However, not every HCM-BuyLine® buy signal will result in full investment exposure to equities, nor will every HCM-BuyLine® sell signal result in full withdrawal from equity exposure. Not every HCM-BuyLine® buy or sell signal will result in a profitable trade. There will be times when following the indicator results in a loss. Each investment strategy we provide uses independent HCM-BuyLine® parameters, meaning the HCM-BuyLine® may produce different signals for different strategies at different times.

Except where agreed, we retain all discretionary decision-making with respect to securities transactions resulting from HCM-BuyLine® signals. As a result, transactions resulting from HCM-BuyLine® signals may not occur on the same day the signal(s) is produced. In addition, certain products, custodians and portfolios may have a delay in execution, which could cause actual transaction dates to differ from the dates when HCM-BuyLine® produced signals. In some instances, this could result in securities transactions (or lack of transactions) which result in less favorable overall performance than if the HCM-BuyLine® system had automatically initiated such transactions (or had refrained from such transactions). Use of HCM-BuyLine® does not guarantee outperformance of any strategies not employing such program and does not insulate an investor from the risk of loss.

There can be no guarantee that the HCM-BuyLine® indicator will perform as anticipated. The HCM-BuyLine® is not a stoploss order that automatically sells securities in the portfolio at a certain price. As a result, it 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.

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%), Bloomberg US Aggregate Bond TR Index (20%). Balanced- S&P 500 Monthly Reinvested Index (5%), HFRX Equity Hedge Index (60%), Bloomberg US Aggregate Bond TR Index (35%). Conservative- S&P 500 Monthly Reinvested Index (5%), HFRX Equity Hedge Index (40%), Bloomberg 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. Bloomberg 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 Bloomberg 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 www.bloomberg.com/professional/products/indices/ for more information regarding Bloomberg 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.

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