



A Registered Investment Advisor

Revenue Sharing Disclosure

Strategic Partnership Program

Sigma Planning Corporation (“SPC,” “we,” or “our”) offers its clients access to the account management services of a wide variety of third-party investment advisers (“TPIAs”). SPC has created a “strategic partnership program” that is available to interested TPIAs. This program consists of four partnership structures at increasing partnership fee levels—Basic, Executive, Premier, and Elite—that offer benefits which increase with each level. Depending on the level, such benefits can include, but are not limited to, joint reviews and planning sessions between key personnel of SPC and the TPIA, sharing of investment adviser representative (“IAR”) mailing lists and contact information, the ability to provide education and training for our IARs, co-branded email campaigns, presentation opportunities at corporate conferences, and access to virtual events throughout the year.

In all cases, the partnership fee that SPC receives is a flat dollar amount. However, the partnership fees can vary from TPIA to TPIA based upon the partnership structure selected by the TPIA. These partnership fees present a conflict of interest by creating an incentive for SPC to steer clients and IARs toward participating TPIAs over non-participating TPIAs by promoting, touting, and otherwise favoring participating TPIAs in SPC’s communications and marketing efforts. Furthermore, the fact that these fees can differ in amount from TPIA to TPIA presents a conflict of interest by creating an incentive for SPC to steer clients and IARs toward participating TPIAs that pay more to SPC than others.

Please note that our IARs do not receive any portion of the partnership fee payments that SPC receives from TPIAs. All partnership fees are remitted by the TPIA directly to SPC and are not derived from client funds or assets. The current participating TPIAs and their respective 2022 payments to SPC (as of April 2022) are as follows (non-participating TPIAs are not listed):

Elite

- SEI – \$100,000
- First Trust Portfolios – \$75,000

Premier

- Orion Portfolio Solutions / Brinker Capital – \$75,000
- Toews Corporation – \$75,000
- AssetMark – \$50,000

Executive

- Beacon Capital Management – \$55,000
- Clark Capital Management Group – \$10,000

Basic

None

Fidelity Credits

The custodian for assets held in SIGMA Managed Accounts is National Financial Services LLC (“NFS”), and the broker is Fidelity Brokerage Services LLC (“FBS”) (NFS, and FBS and its affiliates, are collectively referred to as “Fidelity”). SPC is independently owned and operated from, and is not affiliated with, Fidelity.

NFS is also the clearing firm utilized by Sigma Financial Corporation (“SFC”) and Parkland Securities, LLC (“Parkland”). SFC and Parkland are affiliated broker-dealers under common ownership and control with SPC. Many of our IARs are dually registered with SFC or Parkland, and therefore SPC clients who open brokerage accounts may (but are not

required to) select NFS for this purpose. For more information regarding SFC and Parkland, including their revenue-sharing arrangements with NFS, please review a copy of their Customer Relationship Guide that is available on their public websites (www.sigma4clients.com and www.parkland4clients.com).

While we do not believe that their arrangements with NFS affect the judgment or advice of SPC or its IARs, we believe it is important for our clients to be aware of these arrangements. Please note that SPC does not receive any portion of the revenue from their arrangements.