

Voya Financial Advisors, Inc. Disclosures

Pursuant to Regulation Best Interest

Voya Financial Advisors, Inc. (“VFA,” the “Firm,” “we,” “us,” or “our”) is a dually registered broker-dealer and registered investment adviser. VFA, through your registered representative(s), who may also be registered as an investment adviser representative (your registered representative, whether or not also an investment adviser representative, a “financial professional”), makes a wide variety of securities and investment products available to you through brokerage accounts, products sold on a subscription-way basis, and held as part of an investment advisory account. These disclosures cover the recommendations the Firm makes to you, through its financial professionals, of account types, including but not limited to investment advisory accounts, and recommendations of particular securities and investment strategies in its role as a broker-dealer. The disclosures are designed to help you understand the capacity in which the Firm operates, the fees that you will pay to invest through us, the compensation we receive, and the conflicts of interest we have in providing services to you.

I. Capacity as a Dual Registrant

As discussed above, we are a dually registered broker-dealer and registered investment adviser. This means that we are registered with the Securities and Exchange Commission (“SEC”) as a broker-dealer, which permits us to recommend to you and execute securities transactions, and an investment adviser, which permits us to offer investment advice to you for a fee.

As a broker-dealer we are a member of the Financial Industry Regulatory Authority (“FINRA”). More information about VFA can be found on FINRA’s BrokerCheck website at brokercheck.finra.org by searching for Voya Financial Advisors, or for our Central Registration Depository (“CRD”) number, 2882. You can also find more information about VFA as an investment adviser on www.adviserinfo.sec.gov and inputting VFA’s name or CRD number.

These disclosures primarily concern VFA in its role as a broker-dealer. If you are seeking information regarding VFA in its role as an investment adviser, then please consult VFA’s Form ADV, which is available on www.adviserinfo.sec.gov, www.voyafinancialadvisors.com, or through the financial professional that services your account.

A. Capacity when recommending account types, securities, and investment strategies

VFA makes a wide variety of account types, as well as securities and insurance products and services, available to its customers. As discussed in more detail in Section V, the particular financial professional with whom you’re working may offer the same or less variety of accounts, products and services than the Firm.

When making a recommendation regarding a type of account, the Firm and its financial professional act in the capacity of a broker-dealer with respect to brokerage and subscription-way accounts and in the capacity of an investment adviser with respect to investment advisory accounts. In addition, if you choose to open an investment advisory account, subsequent actions with respect to such investment advisory account will be performed by us in our role as an investment adviser. Please consult VFA’s Form ADV Part 2A for more information regarding our investment advisory business.

If you open a brokerage account, or purchase a product directly from the product sponsor, VFA is acting and will continue to act in its role as a broker-dealer. When acting as a broker-dealer, VFA is required to act in your best interest when recommending account types, securities and certain insurance products, and investment strategies, unless required to act pursuant to a

heightened standard under state law. We are not, however, required to monitor your account, and we do not and will not offer account monitoring services in our role as a broker-dealer.

Generally, VFA's broker-dealer services are performed in an agency capacity, meaning that we act as your agent in facilitating your purchase of securities from, or sale of securities to, another party. In certain fixed income transactions, however, VFA will act as a "riskless principal," meaning that we will facilitate the securities transaction between you and the third party by purchasing it from or selling it to you, and selling it to or purchasing it from the third party.

B. Products and Services Offered

We offer a wide array of account types, products and services to you. Please see the chart below for the account types, securities products, and services to you:

Account Types	Broker-Dealer	Investment Advisory
Non-qualified accounts	X	X
Individual Retirement Accounts	X	X
Discretionary Accounts		X
Retirement Plan Accounts	X	X
529 Plans	X	X
Uniform Transfer to Minor/ Uniform Gift to Minor Accounts	X	X
Margin Accounts	X	X

VFA offers the broker-dealer accounts identified above through a brokerage account and through a subscription-way transaction, with the exception of margin accounts, which are only offered through a brokerage account. In a subscription-way transaction, the customer purchases the product directly from the product company, and does not maintain a brokerage account with VFA in which securities are purchased and sold. Insurance products, mutual funds, and alternative investments are offered by VFA through subscription way transactions.

VFA offers an array of securities to you. Below is the list of security types offered by VFA:

- Equities
- Fixed income
- Exchange-traded funds
- Mutual funds
- Unit investment trusts
- Certificates of deposit
- Interval Funds
- Real Estate Investment Trusts
- Options/Derivatives
- 1031 Exchange Products

In addition to its broker-dealer and investment adviser registration, VFA is also licensed as an insurance agency and offers insurance products to customers. Below are the types of insurance products that VFA offers:

- | | |
|---------------------------|---------------------------|
| ▪ Variable Life Insurance | ▪ Fixed Indexed Annuities |
| ▪ Variable Annuities | ▪ Buffered Annuities |

VFA and its financial professionals will recommend a particular securities transaction to you, or we may recommend a number of transactions over time that constitute an investment strategy. An investment strategy can encompass multiple product types.

You will complete and sign a worksheet to open an account and, in certain circumstances, purchase a product through us. Please read the worksheet carefully, including the disclosures contained therein, and ensure that the information about you on that worksheet is accurate.

It is important to understand that you should never:

- Make any checks or other payment methods (e.g. ACH or wire transfers) payable to your financial professional or to any business name that is owned or controlled by your financial professional;
- Give your financial professional cash;
- Make any investment in any business or venture in which your financial professional is involved in the organization or management of, unless the investment and payment for the purchase are made and processed through our Firm; or
- Make a loan to or give a cash gift to your financial professional.

C. Material limitations on products and services offered

VFA and its financial professionals are limited in which securities and investment strategies they offer in a number of ways. VFA is an introducing broker-dealer that executes its securities transactions in brokerage accounts through a clearing broker-dealer. VFA's clearing broker-dealer is Pershing LLC. VFA is therefore limited in what securities it can offer you in brokerage accounts based on the securities offered by Pershing LLC on its trading platform. Further important information about our relationship with Pershing LLC can be found in the Account Agreement that accompanies the worksheets you fill out and sign to open an account with us.

VFA maintains a product due diligence committee, which considers which products and product types to offer for sale to customers. For example, while a particular mutual fund company may be available to you in the market, VFA may not have approved such mutual fund for sale on its product shelf, which prevents our financial professionals from recommending the mutual fund to you. VFA also prohibits certain products, such as cryptocurrency, for sale through the Firm. VFA is therefore limited in making recommendations to you by the products that are approved for sale by the Firm.

In addition, as discussed more in Section IV(C) below, the Firm generally limits the products it offers to products sponsored by its partners in the Firm's various product partner programs.

As stated in Section I(A), above, the Firm does not offer account monitoring services, and will therefore not monitor your account. VFA and its financial professionals will, from time to time, review your account to determine if we desire to make subsequent recommendations to you, but we have no duty to make recommendations to you, nor advise you with respect to your account in our role as a broker-dealer.

VFA policy prohibits its financial professionals from exercising discretion with respect to customer brokerage and subscription way accounts. VFA's services are therefore limited to non-discretionary account and securities recommendations with respect to such accounts. Further, VFA does not permit the extension of margin in discretionary investment advisory accounts.

Financial professionals affiliated with us offer other products and services that are not sold through the Firm. These products and services are commonly referred to as "outside business activities" and include, but are not limited to, term and whole life insurance, fixed annuities, property-casualty insurance products, and other services. FINRA's BrokerCheck entry for your particular financial professional will list the outside business activities of your financial professional.

Certain VFA financial professionals work in a particular "channel" that limits the types of products that those financial professionals can offer:

1. VFA's Retirement Advisory Distribution (RAD) Channel financial professionals service tax exempt market retirement plans, such as governments, school districts, and hospitals, and their plan participants. RAD Channel financial professionals generally only sell and service retirement plan products offered by our affiliate, Voya Retirement Insurance and Annuity Company, to such plans. If you are discussing your investment in your workplace retirement plan with a VFA financial professional, you should know that the investment options within your plan are limited to products issued by Voya Retirement Insurance and Annuity Company, and the product made available to you is negotiated between VFA and your workplace retirement plan sponsor. RAD Channel representatives do not have a similar restriction when recommending products and services outside of your workplace retirement plan.
2. VFA's Investor Channel is a phone-based team of financial professionals. Investor Channel financial professionals are employees of VFA's affiliate. While the Investor Channel can sell the same brokerage and subscription way products as the Firm generally, their investment advisory products and services are limited. As an employee of VFA and its affiliates, Investor Channel financial professionals do not earn commissions, trails, or fees, but their sales and level of service are factored into their compensation. If you are interacting with a VFA financial professional exclusively telephonically, please ask if the financial professional is associated with the Investor Channel, and, if desired, ask him or her to explain the extent of products and services that he or she can offer.
3. Certain VFA financial professionals participate in the Voya Retirement Readiness Program, in which participants in workplace retirement plans can discuss investments outside of their workplace retirement plans with VFA financial professionals. VFA maintains a list of products that financial professionals who participate in the Retirement Readiness program can offer to plan participants under the Retirement Readiness program. This list is limited as compared to the array of products and services that VFA generally offers.

As discussed in more detail in Section IV, VFA maintains a clearing arrangement with Pershing LLC. Pershing LLC maintains a no-transaction fee program, in which certain mutual funds and exchange traded funds are made available for purchase without a transaction, or "ticket" charge,

and other fees and costs. VFA does not participate in Pershing LLC's no-transaction fee program in its role as a broker-dealer, which means that it does not offer the lowest-possible cost investment product to you in that role. Pershing LLC's no-transaction fee program is available to you through VFA in its role as an investment adviser, and may be available at other broker-dealers.

In its role as broker-dealer, VFA policy limits the mutual fund share classes offered to you to A share and C share classes, or each particular mutual fund sponsor's equivalent thereof. If a mutual fund sponsor with which the Firm maintains a sales agreement offers only no-load mutual funds that are not based on broad market indices, then the Firm offers the lowest-cost share class of that mutual fund that will pay the Firm revenue sharing described in Section IV(C), below. Customer positions and systematic plans that existed prior to July 1, 2020 and that do not meet the terms of this policy will continue to be honored. This policy creates a conflict of interest, as the Firm maintains this policy based on revenue considerations, rather than customer needs.

II. Fees, Costs, and Account Minimums

A. Costs for securities transactions.

As a broker-dealer, we charge a commission or mark-up, or earn a sales load or insurance commission for the products we sell. We also earn ongoing trail compensation or Rule 12b-1 fees for certain insurance products and mutual funds, respectively, that we sell to you. Certain products, such as life insurance, annuities, mutual funds, and exchange-traded funds, contain internal expenses charged by the product sponsors. Below is a chart of the type of expenses that you may pay by product type. Note that commissions on equities, exchange traded funds, and no-load mutual funds, as well as markups/markdowns, are assessed by the Firm, through its financial professionals. The remaining charges are set by the particular product sponsor issuing the product or security.

Product	Commission	Markup/ Markdown	Sales Load	Trail	12b-1 fee	Internal Expenses
Equities	X					
Fixed Income	X	X				
Exchange Traded Funds	X					X
Mutual Funds			X		X	X
Mutual Funds (no-load)	X				X	X
Unit Investment Trust			X		X	X
Certificate of Deposit	X	X				
Interval Fund			X		X	X

Real Estate Investment Trust (traded)	X					X
Real Estate Investment Trust (non-traded)			X	X		X
1031 Exchange Products*			X	X		X
Life Insurance	X			X		X
Annuities	X			X		X
Options	X					

***Note:** Pursuant to SEC Administrative Proceeding File No. 2-20183, VFA is not permitted to offer products sold pursuant to Securities Act Rule 506 (Reg D Private Placements) for compensation. This includes 1031 Exchange Products. VFA's inability to earn compensation on Reg D Private Placements is a conflict of interest, as it is disincentivized to offer you such products, despite its ability to do so for no compensation.

Commissions, markup/markdowns, and sales loads are paid upon the purchase and/or redemption of the security. Trails, 12b-1 fees, and internal expenses are paid on an annualized basis. Non-insurance product commissions, markups/markdowns, internal expenses, and sales loads of mutual funds are paid from your initial or ongoing investment, meaning that the total amount invested in the product or security will be less than your initial investment amount. Insurance product commissions and trails, and 12b-1 fees, are paid from the assets of the product or product sponsor, and are not directly born by you. However, the internal expenses charged by such products (which are paid by you) are used to cover the costs of the insurance product commissions and trails, and 12b-1 fees, making such charges an indirect expense to you and lowering your account value. For example, mutual fund share classes that pay 12b-1 fees have higher ongoing expenses than those that do not pay 12b-1 fees, resulting in a lower account value in connection with the higher ongoing expense.

The fees and charges described above vary from product to product, between different products or securities within the same product type, and between different share classes of the same product. Consider the following example:

A variable annuity's commission is higher than a mutual fund's sales load. The sales load of mutual fund from Company A is different than the sales load of a similar mutual fund from Company B. The same mutual fund from Company B will charge a different sales load and internal expenses depending upon whether the customer purchases the A-Share class or the C-Share class.

VFA's financial professionals also charge different rates for commissions and markup/markdowns. The commission or markup/markdown will be expressed either as a flat dollar amount or percentage of the underlying securities transaction. Firm policy limits how much a financial professional can charge for commission or a markup/markdown. A financial professional's commission or markup/markdown rates will vary by security type, and by

transaction for the same security. With the exception of the Investor Channel, VFA's financial professionals are free to choose the commission charged to you subject to the Firm maximum, or may choose not to charge you a commission. If a fixed income investment or certificate of deposit is purchased from or sold to another broker-dealer, that broker-dealer will include a markup or markdown on its sale or purchase price for that particular fixed income investment or certificate of deposit.

Transactions executed in a brokerage account are charged a transaction fee, or a "ticket charge." Pershing LLC assesses the ticket charge to VFA, and we assess it to your financial professional, or in the case of the Investor Channel, absorb the cost. The ticket charge includes a charge by Pershing LLC to cover its execution costs, and a charge by VFA to make products available to our financial professionals to sell to you. The assessment of ticket charges to VFA our financial professionals is a conflict of interest, as it informs, in part, the commission that your financial professionals charges you for purchases and sales in your brokerage account.

The chart below displays the ranges, expressed in percentage, of the fees and charges assessed by VFA:

Charge or Fee	Range (of investment amount or assets)
Commission	0.00-5.00%
Markup/Markdown	0.00-2.50%
Sales Load	0.00-5.75%
Trail	0.00-3.75%
12b-1 Fee	0.25-1.00%
Internal Expenses	0.00-2.00%

Information regarding the charges and fees you will pay, including but not limited to sales loads, trails, 12b-1 fees and internal expenses, are contained in the product prospectus, offering document, or other similar offering materials. The exact fees and charges you pay for a particular transaction are contained on the transaction confirmation and your account statement. Please read these documents carefully and ensure you understand them. Any questions you have regarding the contents of these documents can be posed to your financial professional.

B. Miscellaneous Fees attributable to your account

Accounts at VFA are subject to a number of miscellaneous account and service fees. Those fees are listed on VFA's "Schedule of Miscellaneous Account and Service Fees," which will be provided to you upon opening your account, and sent to you if any such fees change. Not all fees are applicable to your account, and are determined based on the miscellaneous activity in your account. For example, VFA charges a fee each time margin is extended to your account. If your account is not a margin account, then no fee will be assessed for margin extensions.

Miscellaneous account and service fees are comprised of a fee by Pershing LLC and an associated fee by VFA. You will see the miscellaneous account and service fees charged in your account on your account statement. Please read that document carefully, and consult your financial professional if you have any questions.

C. Account Minimums and Thresholds

VFA does not have an account minimum for brokerage accounts. Account minimums apply to certain VFA investment advisory programs. Those account minimums are disclosed in VFA's Form ADV Part 2A. Certain VFA financial professionals maintain account minimums for brokerage accounts, which will be disclosed to you in Section V.

Certain mutual funds, exchange-traded funds, insurance products, and alternative investment product sponsors maintain a minimum investment amount for investment in particular products. Please consult a product's prospectus or offering materials for any such investment minimum.

Certain products offer discounts of commissions, sales loads, and other charges based on the amount that you invest. Such programs vary among products. The product's prospectus or offering documents provides detailed information regarding the discounts available based on particular investment amounts. Please read such documents carefully, and consult your financial professional if you have any questions.

III. VFA's Investment Approach and Risks of Investing

A. Investment Approach

VFA's investment philosophy is that our financial professionals work with our customers to understand their investment objectives, risk tolerance, time horizon, and other factors to determine the appropriate account type, securities and investment strategies for each customer. The financial professional with whom you are working is responsible for recommending an account type, the security or securities held in that account, and/or investment strategy that best aligns to your stated investment objectives, risk tolerance, time horizon, and other factors. It is your choice whether to implement such a recommendation and/or strategy.

Since VFA's financial professionals service a wide variety of customers, the Firm makes an array of securities and insurance products available to its financial professionals, and does not concentrate its sales practice on any particular type of securities. The Firm does, however, limit the accounts, products and services available to you, as discussed in Section I(C), above. In particular, the Firm's Investment Product Due Diligence Committee evaluates products for inclusion on VFA's product shelf through application of its investment philosophy, which considers whether a product can reasonably serve the best interest of at least one VFA customer, and generally serves VFA and its financial professionals' business model.

Material differences between a particular financial professional's investment philosophy and the Firm's philosophy, should they exist, are explained in Section V of this document. The Firm conducts supervision and oversight of its financial professionals, as required under FINRA rules, to help ensure recommendations are in the best interest of the particular customer to whom they are made.

B. Risks of Investing

All investing involves the risk of loss, including the loss of the entire amount that you invest. This risk varies based on the type of the security or product purchased. All securities sold have disclosure documentation that discusses these risks. The initial disclosure

document is commonly referred to as a prospectus, but may be called something else depending on the type of security or product you have purchased. Publicly traded companies also maintain periodically updated disclosure documents that are useful in evaluating the potential benefits and risks of that publicly traded company's securities.

As discussed above, life insurance and annuity products sold through the Firm may be registered as securities. All insurance products include a liquidity risk, meaning that you cannot withdraw the entire amount that you invest or deposit in the insurance product at any time, or without penalty. For insurance products that are also securities, the risk of loss described in the preceding paragraph exists. The prospectus or buyer's guide that accompanies your insurance product contains further information about the risk associated with the product you purchase.

It is extremely important that you read documents provided to you with respect to the accounts, products and services you purchase in their entirety. If you have any questions regarding the information presented or concepts discussed within these documents, please speak with your financial professional immediately.

IV. Conflicts of Interest

VFA and its financial professionals are subject to a number of conflicts of interest with respect to the services and products we offer to you.

A. Conflicts of interest regarding remuneration and capacity

VFA is compensated in its role as a broker-dealer by earning commissions, markup/markdowns, sales loads, trails, 12b-1 fees, and miscellaneous fees from you. Commissions, markup/markdowns, and sales loads are tied to transactions in your account, meaning that the Firm earns the charge when you purchase or sell securities. Trails and 12b-1 fees are derived from the assets you hold in a particular investment or product on an annualized basis. The Firm retains a portion of the compensation derived from these categories of charges and passes the remainder of the charge to its financial professional. This structure creates a conflict of interest. The Firm and its financial professionals are incentivized to make recommendations to you to earn compensation, and are further incentivized to recommend to you products and services that pay a higher rate of compensation than other products and services. For example, the Firm and its financial professionals are incentivized to recommend load mutual funds rather than no-load mutual funds because load mutual funds provide a higher rate of compensation to the Firm and its financial professionals. (With respect to mutual funds, the term "load" is the equivalent of a commission.) Independent contractor non-RAD financial professionals are entitled to a bonus expressed as a percentage of their annual compensation if their sales reach certain thresholds each calendar quarter. This is a conflict of interest, as these financial professionals are incentivized to increase sales and assets under management to qualify for this bonus.

While VFA generally keeps a portion of the compensation generated from product sales, the Firm pays its RAD Channel financial professionals 100% of the compensation generated in connection with each particular RAD Channel financial professional's sales and servicing of tax-exempt market 403(b) plans and corporate 401(k) plans. Further, RAD Channel financial professionals earn further compensation from the Firm's affiliate, VRIAC (defined below) in the following ways:

1. RAD Channel financial professionals that meet a certain threshold of sales of VRIAC products are eligible to become classified as statutory employees of VRIAC, which affords such RAD Channel representatives benefits such as health insurance and retirement plan benefits.
2. Non statutory employee RAD Channel financial professionals are eligible for a fixed dollar bonus if they meet certain sales and asset thresholds of VRIAC products.

These arrangements create a conflict of interest, as it incentivizes RAD Channel financial professionals to concentrate their activities on selling and servicing VRIAC products, as opposed to selling retail investment products.

As discussed in Section I, above, VFA policies make certain financial products and account types available to clients only in the Firm's role as a broker-dealer, for which it receives commissions. For example, we currently make alternative investments available to you in our role as a broker-dealer, and you will be charged a commission for your purchase of an alternative investment. Other firms may offer such financial products and accounts in their role as an investment adviser. In such cases, shares of the product you are choosing may be purchased net of commission, resulting in more shares to you than if the same product is purchased through the Firm on a commission basis. Purchasing such products through the Firm in its role as broker-dealer will result in you receiving fewer shares for the same purchase price than you would receive if you purchased the same investment in an investment advisory account. You will receive lower investment returns over the short term, and incur higher execution costs due to the Firm's policy, as compared to the same financial product held in an investment advisory account. In certain scenarios, you will pay more fees and expenses over the course of holding the product by purchasing it from VFA in its capacity as a broker-dealer than you would pay if the product had been purchased in an investment advisory account.

Offering such financial products only in the Firm's capacity as a broker-dealer creates a conflict of interest, as the Firm, in certain circumstances, earns more compensation pursuant to this policy than if it permitted such products to be purchased as an advisory account. Furthermore, VFA does not owe a fiduciary duty to you when it offers products in its role as a broker-dealer.

B. Conflicts of interest regarding VFA's clearing relationship and third party agencies

Pershing is the only firm with which VFA has a fully disclosed clearing agreement. Therefore, VFA can only execute your brokerage, non-subscription way transactions through Pershing. Other clearing firms offer less expensive execution of customer transactions, and in certain circumstances, execution of customer transactions on better terms. This creates a conflict of interest, as VFA routes your orders through Pershing for its own contractual arrangements, including the compensation arrangements with Pershing described below, without regard to whether your transaction could be executed for less cost and on better terms at another clearing firm. The fees charged by VFA and Pershing, or any other designated custodians are exclusive of and in addition to the internal expenses charged by the product sponsor.

Pursuant to an agreement with Pershing, Pershing reimburses the Firm for transition fees incurred in moving new customer assets to the Pershing platform. Additionally, pursuant to its agreement with Pershing, the Firm is credited \$5.00 of each annual maintenance fee for general securities Individual Retirement Accounts ("IRA"), and \$2.50 of each annual maintenance fee for mutual fund only IRAs held on the Pershing platform as revenue sharing. This reimbursement and credit creates the following conflicts of interest: i) it incentivizes the Firm to

custody assets, including IRA accounts, on the Pershing platform as opposed to another custodian that neither reimburses the Firm for transition fees nor credits the Firm a portion of the annual IRA maintenance fee, and ii) it incentivizes the Firm to open general securities IRA accounts, which charge the customer a higher annual maintenance fee, as compared to the maintenance fee charged for mutual fund only IRA accounts.

Pershing also provides compensation to VFA based upon the assets of VFA customers that are held in money market mutual funds on the Pershing platform. This creates a conflict of interest, as it incentivizes VFA to retain Client assets in money market mutual funds on the Pershing platform and results in a lower yield to you due to the higher expense of such money market mutual funds.

Through an agreement with Pershing, VFA is paid a percentage fee by Pershing on all assets (mutual funds, exchange traded funds, equities, bonds and other assets) above a certain threshold custodied at Pershing by VFA customers. Pershing pays VFA a higher percentage if the assets VFA holds at Pershing meets certain thresholds. VFA receives this percentage fee payment from Pershing in addition to any payments it receives on such assets from its Product Partner firms described above. In addition, Pershing pays VFA a per-account fee for each customer account of VFA held at Pershing. These payments create a conflict of interest between VFA and its customers, as these payments provide VFA with an incentive to recommend investing through Pershing as opposed to another investment program that does not provide VFA with such fees. You are able to purchase the same or other similar securities, products and services at another broker-dealer or investment adviser, but for a lower cost.

Pershing also exempts the Firm from payment of 5% of the VFA's total inactive account fees, and reimburses VFA a portion of each annual fee for Pershing Corestone checking features placed on customer accounts. The exemption and reimbursement are conflicts of interest. VFA earns compensation via cost avoidance with respect to inactive account fees, and is incentivized to recommend customers add Corestone checking features to their account due to Pershing's reimbursement of a portion of the Corestone fees.

VFA's utilizes a number of independent marketing organizations (IMO) to perform marketing and product processing with respect to insurance products sold by the firm. Certain of these IMOs are owned or otherwise controlled by our financial professionals. VFA financial professionals that own or otherwise control an IMO have a conflict of interest when recommending products to you. They are incentivized to recommend insurance products as their IMO earns compensation from insurance product sales that it does not earn when you purchase other products. This is a benefit to the financial professional.

Further, VFA's affiliate, Voya Insurance Solutions, Inc., has contracted with independent IMOs to process annuity and life insurance transactions. Voya Insurance Solutions, Inc. earns additional compensation for the processing of insurance transactions through these IMOs. This is a conflict of interest, as it incentivizes VFA to recommend insurance products to you based upon the additional remuneration earned by our affiliate.

C. VFA's Product Partners Program

VFA participates in Voya Financial, Inc.'s Product Partners Program. This program enables participating investment product providers ("Product Partners") to receive services and value from VFA through reporting, marketing/sponsorship/engagement opportunities with VFA and its financial professionals, enhanced communication, education, access to key contacts at VFA,

and relationship management. Participation in the Product Partners Program is contingent upon the products offered by the potential Product Partner meeting VFA's product standards and, generally, the payment of fees to VFA, as discussed below. Certain affiliates of VFA are Product Partners.

Product Partners attend or sponsor education and training meetings, either in conjunction with a Product Partner's participation level in the Product Partners Program or in exchange for an additional fee to VFA through the Product Partner Engagement Program. Non partners are also permitted to attend sponsor education and training meetings through the Product Partner Engagement Program in exchange for a fee, at the sole discretion of VFA.

In general, for a product to be included on VFA's approved product shelf, the product sponsor must participate in the Product Partners Program by paying the applicable fee, as described below. There are, however, product sponsors that do not pay to participate in the Product Partners Program, and whose products are permitted on the VFA approved product shelf. Additionally, not all share classes of products for a given Product Partner pay additional revenue to VFA. Further, VFA's calculation of the fees a Product Partner owes will exclude certain kinds of accounts and products, depending upon the agreement between the Product Partner and VFA. VFA reserves the right to not include product sponsors on its product shelf, therefore not permitting you to purchase certain products through VFA, if the product sponsor does not participate in the Product Partners Program. This creates a conflict of interest, as VFA chooses which products to make available to you based on the remuneration paid to VFA by the sponsors of those products. This conflict results in VFA recommending financial products and services to you that are more expensive than similar products and services you could obtain elsewhere.

Product Partners pay a fee to VFA to compensate VFA for the opportunities offered through the Product Partners Program, which are conditioned on participating in the Product Partners Program at the particular Product Partner fee level. The fee is based on a number of factors, including but not limited to the amount of VFA customer assets held in the Product Partner's products, and is calculated for each Product Partner. The additional compensation VFA receives in connection with the sale of Product Partner products poses a conflict of interest for VFA to promote such products over other products as to which VFA does not receive such additional compensation. However, Clients are able to purchase, through other firms, Product Partner products, other products and services offered through VFA, or similar products and services, for a lower cost.

VFA from time-to-time adds or removes specific firms from its Product Partners Program. Certain products offered by the Product Partners listed are not offered through the Firm's investment advisory program. Below is the current list of Product Partners:

Mutual Fund/Exchange Traded Fund Product Partners:

- | | |
|-----------------------------------|--|
| ■ Alger Funds | ■ Davis Funds / Select Funds / Clipper Funds |
| ■ Allianz Global Investors | |
| ■ American Century Investments | ■ Doubleline Funds |
| ■ Amundi Pioneer Asset Management | ■ Federated Investors |
| ■ Aquila Group of Funds | ■ Fidelity Institutional Asset Management |
| ■ Buffalo Funds | ■ First Trust |

- Franklin Templeton Investments
- Invesco Funds
- Lord Abbett Funds
- MassMutual Funds
- MFS Investment Management
- Natixis Investment Managers
- Neuberger Berman Funds
- Pacific Life Funds
- PIMCO Funds
- Principal Funds
- Prudential Global Investment Management
- Putnam Investments
- T. Rowe Price Funds
- Thornburg Investment Management
- Transamerica Mutual Funds
- Victory Capital Management
- Virtus Investment Partners
- WisdomTree Exchange Traded Funds

Insurance Product Partners:

- Allianz Life
- Athene
- Equitable Insurance
- Brighthouse Financial
- Forethought Life Insurance Company (Global Atlantic Financial Group)
- Great American Insurance Group
- Jackson National Life Insurance
- Sammons Financial (Midland National Life Insurance Company and North American Life Insurance)
- Nationwide Life and Annuity Company
- Pacific Life Insurance Company
- Protective Life Insurance Company
- Pruco Life Insurance Company (Prudential)
- Transamerica Life Insurance Company

Third Party Platform Partners:

- AssetMark, Inc.
- Flexible Plan Investments Ltd.
- SEI Investment Management

Alternative Investment and Interval Fund Marketing Reallocation

In addition to the Product Partners described above, certain distributors of units in SEC-registered public and non-SEC-registered non-public non-traded Real Estate Investment Trusts and Direct Participation Programs, shares of non-traded common stock, corporations, and shares of Regulation D offerings participate in the Product Partners Program and pay additional amounts outside the Product Partners Program to VFA to compensate VFA for enhanced marketing and training opportunities. The payment of this additional compensation to VFA by these distributors poses a conflict of interest by creating a financial incentive for VFA to promote these products over other products.

The additional amounts distributors pay VFA vary from one to another and from one product to another. For example, a significant portion of these payments can be calculated as a fixed

amount or as a percentage of product sales (up to a maximum of 1.5%—which would be \$150 on a \$10,000 investment). Please read the prospectus, statement of additional information, and your offering memorandum for each product to learn more about these payments. While your financial professional receives a commission for selling one of these products, he or she does not receive additional compensation based on the payment of marketing reallocation. Your financial professional may attend a training and education meeting to learn more about these products, the investment features they contain, and general industry or market trends.

Below is the current list of companies that issue alternative investments or interval funds that participate in the Product Partners Program and compensate the Firm for enhanced marketing and training opportunities:

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|-----------------------------------|--------------------------|
| ■ Blue Rock Capital Markets, LLC | ■ Griffin Capital |
| ■ CION Investments | ■ Hines Securities, Inc. |
| ■ CIM (Cole) | ■ Inland Real Estate |
| ■ FS Securities (Franklin Square) | |

Below is the current list of companies that issue alternative investments or interval funds and compensate the Firm for enhanced marketing and training opportunities through marketing reallocation only:

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|-------------------------------------|---------------------------|
| ■ Altegris | ■ Voya/Pomona Investments |
| ■ Dividend Capital Securities, Inc. | |

VFA has entered into arrangements outside of the Product Partners Program for the following product sponsors:

Voya Investment Management: Voya Investment Management (VIM) is an affiliate of the Firm. While VIM receives opportunities similar to those received by non-affiliated Product Partners, VIM's arrangement with VFA is not subject to the Product Partners Program. VFA receives compensation from VIM based on a percentage of assets invested in funds for which VIM acts as investment manager. Though the amount of compensation paid to VFA by VIM will vary each year, the compensation will represent a sum of up to .51% of VFA customer assets held in funds for which VIM acts as investment manager, subject to certain exceptions based upon the fund, the share class of the fund, or the account type in which the fund is held.

Voya Retirement Insurance and Annuity Company (VRIAC): VRIAC is an affiliate of the Firm. While VRIAC receives opportunities similar to those received by non-affiliated Product Partners, VRIAC's arrangement with VFA is not subject to the Product Partners Program. VFA receives compensation from VRIAC based upon a) new sales of Voya Select Advantage accounts, and b) VFA customer assets invested in Voya Select Advantage accounts. Though the amount of compensation paid to VFA by VRIAC will vary each year, the annual compensation will represent a sum of 0.25% of sales by VFA of Voya Select Advantage accounts, and 0.05% of VFA customer assets held in Voya Select Advantage accounts.

American Funds: While American Funds Distributors receives opportunities similar to Product Partners, its arrangement with VFA provides that the amount of compensation to VFA will be determined based upon a number of factors, including the level of assets invested in American Funds, net sales, and American Funds' Distributors assessment of the quality of the relationship with VFA. Though the amount of compensation paid to VFA by American Funds Distributors will vary each year, the compensation will represent a sum of up to .10% of the previous year's American Funds sales by VFA, and up to .02% of VFA customer assets held at American Funds.

VFA Strategic Partner Program

Prior to January 1, 2018, VFA maintained the Strategic Partner program. VFA is still subject to certain Strategic Partner agreements and will continue to receive payments from product sponsors participating in the Strategic Partner Program. VFA expects to accrue payments from the following product sponsors under the Strategic Partner program:

Mutual Fund Sponsors

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|---|------------------------------|
| ■ BlackRock Investment Management | ■ Hartford Funds |
| ■ DWS Funds / Deutsche Asset Management | ■ JP Morgan Asset Management |

Variable Annuity Sponsors

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|--|--|
| ■ American General Life Insurance Company (AIG SunAmerica) | ■ Lincoln Financial Group |
| ■ Hartford Life Insurance | ■ Venerable Annuity (Voya Insurance and Annuity Company) |

D. Proprietary product conflicts of interest

Affiliates of VFA, such as VIM and VRIAC, offer products and services that VFA offers to its customers. In particular, VFA offers a) investment model portfolios and mutual funds created, advised, and/or managed by VIM, b) custodial mutual fund and insurance products created, managed, and administered by VRIAC and Voya Institutional Trust Company, and c) equity and fixed income securities issued by Voya Financial, Inc. VFA has a conflict of interest in offering these products to you, as affiliates of VFA earn revenue by your investment in these products.

Customer cash positions in VFA accounts will be deposited into VFA's cash sweep program, the Voya Financial Advisors Insured Bank Deposit Account ("VIBD"), subject to certain exceptions. VFA determines the interest rate payable to you in VIBD in accordance with a formula that considers the prevailing interest rates available to customers through bank deposit cash sweep accounts at other broker-dealer and investment advisory firms, which VFA deems to be peer firms in its sole discretion, as approved by VFA's Investment Product Due Diligence Committee. Further, VFA is compensated on cash balances in VIBD by retaining a portion of the fee that the banks pay for assets for which each bank acts as custodian. The total amount of the fee that VFA receives affects the amount of interest payable to

customers on cash balances in VIBD. Therefore, VFA has a conflict of interest with regard to the VIBD program. First, it is incentivized to move customer cash balances to VIBD to earn its fee, and second, any increase in the fee VFA chooses to receive will decrease the amount of interest received by customers. VFA generally earns more money on your cash held in the VIBD account than you do. A copy of the VIBD Disclosure Booklet is available at the following internet address:

www.voyafinancialadvisors.com/banksweep.

Given current fees paid by the Banks, it is important that clients understand that the fee VFA retains in connection with clients' participation in the VIBD program is greater than the interest VFA pays to clients for their assets held in the VIBD program. VFA believes this will be the case for the foreseeable future.

While VFA's default cash sweep option for clients is VIBD, certain clients will, depending upon account type and other circumstances, have another cash sweep option. Other cash sweep options will, in certain circumstances, earn more money in interest or investment returns than VIBD. This creates a conflict of interest, as VFA is incentivized to choose client cash sweep options for circumstances relating to VFA's investment advisory business model, rather than individualized client circumstances.

E. Other conflicts of interest

As a VFA customer, you may be invited to attend seminars or training and educational meetings. If you attend a training or educational meeting with your financial professional and a product sponsor is present, you should assume that the product sponsor has paid for all or a portion of the cost of the meeting or event, including the cost of travel to the event, and any meals or accommodations offered. Additionally, product sponsors may provide business entertainment or nominal gifts to VFA financial professionals and employees. Payments by the product sponsor to cover all or a portion of the cost of a meeting or event, as well as the receipt of business entertainment or nominal gifts by VFA personnel from product sponsors are conflicts of interest, as they incentivize VFA and its financial professionals to recommend and select investments based on the value of the meetings, events, business entertainment, or nominal gifts offered by the product sponsor, rather than the client's investment needs.

From time to time, product sponsors will reimburse VFA's financial professionals for the purchase of software that the financial professional uses in conducting securities business. This reimbursement creates a conflict of interest as it incentivizes the financial professional to recommend the products of the product sponsor offering reimbursement.

Companies that are not Product Partners may at times send VFA payments and/or non-cash compensation in recognition of VFA's efforts in educating its financial professionals regarding such companies' products, which payments and/or non-cash compensation pose a conflict of interest for VFA to promote such products over other products.

VFA offers its financial professionals incentive programs through which financial professionals are eligible to receive awards, including but not limited to trips, bonuses, and other non-cash items. These incentive programs are based on securities product sales or assets retained through and on behalf of VFA. All incentive awards are pre-approved by VFA, administered according to its procedures, and are based on total production or asset retention for all products and services. From time to time, VFA will weigh certain products or services more heavily in its calculations for purposes of qualifying for such incentives to equalize the value afforded to certain products as compared to others. For example, VFA may weigh investment advisory programs assets under management more heavily than other sales, as investment advisory activity generates less fees during a calendar year than compensation derived from securities transactions. Such weighting provides incentives for your financial professionals to recommend such weighted products or services over others with less weighting. The existence of these

incentive programs and the possibility of receiving incentive awards create a conflict of interest, as they incentivize financial professionals to sell customers products through VFA, and retain customer assets with VFA.

As part of its due diligence of new products and services to offer to clients, the Firm will, from time to time, send its employees to product sponsor or service provider offices or other locales. The product sponsor or service provider will cover the cost of such travel. This is a conflict of interest, as VFA is incentivized to offer the products and services of sponsors and providers that cover the cost of any due diligence travel, as opposed to those sponsors and providers that do not cover the cost of such travel.

The VFA Investor Channel offers certain managed account services to customers who were or are participants of various plans that are recordkept by VFA's affiliates. Sales of such managed account services that are produced by the VFA Investor Channel may generate referral payments to the agent of record for the existing Voya product or plan. Where that is the case, VFA and the agent of record may enter into rules of engagement that govern how rollover sales opportunities will be allocated between the VFA Investor Channel and the agent of record. Typically, low balance rollover opportunities are allocated to the VFA Investor Channel and higher balance opportunities are allocated to the agent of record. VFA, through its financial professionals, concentrates its rollover sales efforts on certain proprietary products and services. Alternative products and services are available through other distributors.

VFA provides forgivable loans to certain financial professionals as an incentive to join or remain with the Firm. The loans are offered to financial professionals at VFA's discretion and vary in amount and terms. Principal amounts loaned to financial professionals are based, in part, on the amount of customer assets that the Firm anticipates will be transferred to VFA by the financial professional or the perceived profitability to the Firm of the financial professional's business. For financial professionals recruited to the Firm, the principal amounts are loaned either upon joining the Firm, or partly upon joining, with the remaining amount loaned upon either the passage of a threshold period of time or a certain threshold of assets being moved to the Firm. Loaned amounts pursuant to a loan are forgiven at regular intervals based on a financial professional's continued affiliation in good standing with the Firm. A financial professional is responsible for paying back any amounts owed if he or she fails to abide by the terms of the loan, including but not limited to failure to maintain securities licensure or affiliation with the Firm. The Firm offering forgivable loans to financial professionals creates a conflict of interest, as it incentivizes financial professionals to select the Firm to service your account(s), and remain with VFA for the duration of the loan's forgiveness terms, instead of another firm that may not offer loans, but may offer the same or similar services of VFA for a lower cost.