

Firm Brochure
(Part 2A of Form ADV)



Frontier Financial Partners, LLC

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This brochure provides information about the qualifications and business practices of Frontier Financial Partners, LLC. If you have any questions about the contents of this brochure, please contact us at: (615)482-6060, or by email at: Jeff.Benson@FrontierFP.net. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Frontier Financial Partners, LLC is available on the SEC's website at www.adviserinfo.sec.gov

October 28, 2022

Frontier Financial Partners, LLC

Material Changes

Annual Update

There are no material changes in this brochure from the last annual updating amendment of Frontier Financial Partners, LLC. Material changes relate to Frontier Financial Partners, LLC's policies, practices or conflicts of interests.

Material Changes since the Last Update

The material changes in this brochure from the last annual updating amendment of Frontier Financial Partners, LLC on March 31, 2021 are described below. Material changes relate to Frontier Financial Partners, LLC's policies, practices or conflicts of interests.

- Nothing to report.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: (615)482-6060 or by email at: Jeff.Benson@FrontierFP.net.

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Advisory Business

Firm Description

FRONTIER FINANCIAL PARTNERS, ("FFP") was founded in 2010.

FRONTIER FINANCIAL PARTNERS provides personalized confidential financial planning and investment management to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

FRONTIER FINANCIAL PARTNERS is a fee-based financial planning, investment management and investment advisory firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted.

Investment advice is an integral part of financial planning. In addition, FRONTIER FINANCIAL PARTNERS advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning.

Investment advice is provided, with the client making the final decision on investment selection. FRONTIER FINANCIAL PARTNERS do not act as a custodian of client assets. The client always maintains asset control. FRONTIER FINANCIAL PARTNERS places trades for clients under a limited power of attorney. Some client accounts are managed through a co-advisory relationship with FRONTIER FINANCIAL PARTNERS and SYMMETRY PARTNERS. In these circumstances, SYMMETRY PARTNERS places trades for clients under a separate limited power of attorney.

A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

Principal Owners

Frontier Financial Partners is a member managed LLC. Jeffrey P. Benson is President and Treasurer, Jadyen Stevens is vice president, and Joseph A. Benson III is Secretary. The Joseph A. Benson Jr. Trust is the exclusive owner.

Types of Advisory Services

FRONTIER FINANCIAL PARTNERS provides investment supervisory services, also known as asset management services; manages investment advisory accounts; furnishes investment advice through consultations; issues special reports about securities; and issues, charts, graphs, formulas, or other devices which clients may use to evaluate securities.

On more than an occasional basis, FRONTIER FINANCIAL PARTNERS furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of 12/31/2021, FRONTIER FINANCIAL PARTNERS have discretionary assets under management (AUM) of approximately \$35,888,672 and non-discretionary assets under management of approximately \$7,814,366.

Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Financial Planning Agreement

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. Fees typically range between \$500.00 and \$5,000.00 and are *NEGOTIABLE*. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

In-the-event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to three months. Follow-on implementation work is billed separately at the rate of \$150.00 per hour.

Investment Management Agreement

When an *Investment Management Agreement* is executed FRONTIER FINANCIAL PARTNERS accepts discretionary authority to manage securities accounts on your behalf. A signed limited power of attorney allows FRONTIER FINANCIAL PARTNERS and in some cases that are co-

advised SYMMETRY PARTNERS trading authorization to execute the trades that you have approved.

The scope of work and fee for an Investment Management Agreement is provided to the client in writing prior to the start of the relationship. An Investment Management Agreement may include: cash flow management; insurance review; investment management (including performance reporting); education planning; retirement planning and estate planning, as well as the implementation of recommendations within each area.

The annual fee for an *Investment Management Agreement* ("**Managed Assets**") is based on a percentage of assets managed according to the following schedule:

Assets up to \$500,000	1.50%
\$500,001 to \$1,000,000	1.25
\$1,000,001 to \$2,000,000	1.00%
Accounts over \$2,000,000	Negotiable

The minimum annual fee is \$300.00 and is *NOT NEGOTIABLE*. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Investment Management Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment advisor may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Advisory Service Agreement

Most clients choose to have FRONTIER FINANCIAL PARTNERS manage their assets to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed, including those of their children. FRONTIER FINANCIAL PARTNERS will advise on both "Managed Assets" and "Held Away Assets". Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. An Advisory Service Agreement may include: cash flow management; insurance review; investment management (including performance reporting); education planning; retirement planning and estate planning, as well as the implementation of recommendations within each area.

The annual Advisory Service Agreement ("**Held Away Assets**") fee is based on a percentage of the assets managed according to the following schedule:

Assets up to \$500,000	1.00%
\$500,001 to \$1,000,000	.75%
\$1,000,001 to \$2,000,000	.50%
Accounts over \$2,000,000	Negotiable

The minimum annual fee is \$300.00 and is *NOT NEGOTIABLE*. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment advisor may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Retainer Agreement

In some circumstances, a *Retainer Agreement* is executed in lieu of an *Advisory Service Agreement* when it is more appropriate to work on a fixed-fee basis. The annual fee for a *Retainer Agreement* is between \$300.00 and \$25,000.00 depending on the scope of services and is *NEGOTIABLE*.

Due Diligence Agreement

In some circumstances, a Due Diligence Agreement is executed in lieu of an Investment Management or Advisory Service Agreement when it is more appropriate to work on a fixed-fee basis. The Fee for a Due Diligence Agreement is generally between \$5,000 and \$50,000 depending on the scope of services and is *NEGOTIABLE*.

Hourly Planning Engagements

FRONTIER FINANCIAL PARTNERS provides hourly planning services for clients who need advice on a limited scope of work. The rate for limited scope engagements is \$150.00 per hour.

Asset Management

Assets are invested primarily in no-load or low-load mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm may charge a fee for stock and bond trades. FRONTIER FINANCIAL PARTNERS does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through FRONTIER FINANCIAL PARTNERS.

Selection of Other Advisor Services

FRONTIER FINANCIAL PARTNERS may direct clients to third-party investment advisors. Before selecting other advisors for clients, FRONTIER FINANCIAL PARTNERS will always ensure those other advisors are properly licensed or registered as an investment advisor.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying FRONTIER FINANCIAL PARTNERS in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, FRONTIER FINANCIAL PARTNERS will refund any unearned portion of the advance payment.

FRONTIER FINANCIAL PARTNERS may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, FRONTIER FINANCIAL PARTNERS will refund any unearned portion of the advance payment.

Fees and Compensation

Description

FRONTIER FINANCIAL PARTNERS bases its fees on a percentage of assets under management, hourly charges, and fixed fees.

Some *Retainer Agreements* may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship.

Financial plans are priced according to the degree of complexity associated with the client's situation.

FRONTIER FINANCIAL PARTNERS may direct clients to third-party investment advisors. FRONTIER FINANCIAL PARTNERS will be compensated via a fee share from the advisors to which it directs those clients. This relationship will be memorialized in each contract between Frontier Financial Partners and each third-party advisor. The fees shared will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisors will depend on the specific third-party advisor selected. FRONTIER FINANCIAL PARTNERS may specifically direct clients to PACIFIC FINANCIAL GROUP (PFG). The annual fee schedule for all assets is up to 2.00%, for which FRONTIER FINANCIAL PARTNERS will receive up to 1.00% and PFG will receive up to 1.00%.

Fees in certain circumstances are *NEGOTIABLE*.

Fee Billing

Investment management fees are billed either quarterly, in *ADVANCE*, meaning that we invoice you *BEFORE* the three-month billing period has *BEGUN* or, in *ARREARS*, meaning we bill you after the three-month billing period has *ENDED*. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed 50% in advance, with the balance due upon delivery of the financial plan.

The timing, frequency, and method of paying fees for selection of third-

party managers will depend on the specific third-party advisor selected and will be disclosed to the client prior to entering into a relationship with the third-party advisor. Fees for selection of PFG are withdrawn directly from the client's accounts with client's written authorization. Fees are paid monthly in arrears.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

FRONTIER FINANCIAL PARTNERS, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to FRONTIER FINANCIAL PARTNERS.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Past Due Accounts and Termination of Agreement

FRONTIER FINANCIAL PARTNERS reserves the right to stop work on any account that is more than 30 days overdue. In addition, FRONTIER FINANCIAL PARTNERS reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in FRONTIER FINANCIAL PARTNERS' judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

FRONTIER FINANCIAL PARTNERS does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the advisor to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

FRONTIER FINANCIAL PARTNERS generally provides investment advice to individuals, investment companies, pension and profit-sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

The minimum account size is \$10,000.00 of assets under management.

When an account is opened with or falls below \$20,000.00 in value, the minimum annual fee of \$300.00 is charged.

FRONTIER FINANCIAL PARTNERS has the discretion to waive the account minimum. Accounts of less than \$10,000.00 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$10,000.00 within a reasonable time. Other exceptions will apply to employees of FRONTIER FINANCIAL PARTNERS and their relatives, or relatives of existing clients.

Clients receiving ongoing asset management services will be assessed a \$300.00 minimum annual fee. Clients with assets below the minimum account size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that FRONTIER FINANCIAL PARTNERS may use include Riskalyze, Zack's Research, Investor's Alley, Oxford Club, TD Ameritrade's VEO service, and the World Wide Web.

Investment Strategies

The primary investment strategy used on client accounts is a FACTOR INVESTING allocation, utilizing a core and satellite approach. This means that we use passively managed index and exchange-traded funds as the core investments, and then add actively managed funds or alternative investments where there are greater opportunities to make a difference. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement or Statement of Investment Selection that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil- drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

FRONTIER FINANCIAL PARTNERS is a state registered Investment Advisory firm governed by the laws of the state of Texas.

Affiliations

FRONTIER FINANCIAL PARTNERS has arrangements that are material to its advisory or its clients with a related person who is an investment advisor (BETTERMENT SECURITIES, PACIFIC FINANCIAL GROUP and SYMMETRY PARTNERS).

FRONTIER FINANCIAL PARTNERS may direct clients to third-party investment advisors. FRONTIER FINANCIAL PARTNERS will be compensated via a fee share from the advisors to which it directs those clients. This relationship will be memorialized in each contract between FRONTIER FINANCIAL PARTNERS and each third-party advisor. The fees shared will not exceed any limit imposed by any regulatory agency. FRONTIER FINANCIAL PARTNERS will always act in the best interests of the client, including when determining which third-party investment advisor to recommend to clients. FRONTIER FINANCIAL PARTNERS will ensure that all recommended advisors are licensed, or notice filed in the states in which FRONTIER FINANCIAL PARTNERS is recommending them to clients.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

The employees of FRONTIER FINANCIAL PARTNERS have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

FRONTIER FINANCIAL PARTNERS and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the FRONTIER FINANCIAL PARTNERS *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of FRONTIER FINANCIAL PARTNERS is Jeff Benson. He reviews all employee trades each quarter. His trades are reviewed by Jeff Benson. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

FRONTIER FINANCIAL PARTNERS does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. FRONTIER FINANCIAL PARTNERS recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

FRONTIER FINANCIAL PARTNERS recommends discount brokerage firms and trust companies (qualified custodians), such as TD Ameritrade, Charles Schwab & Co., Fidelity Investments. FRONTIER FINANCIAL PARTNERS is an advisor with TD Ameritrade, Equity Institutional, and Betterment Securities.

FRONTIER FINANCIAL PARTNERS *DOES NOT* receive fees or commissions from any of these arrangements.

Best Execution

FRONTIER FINANCIAL PARTNERS reviews the execution of trades at each custodian each quarter. The review process is documented in the FRONTIER FINANCIAL PARTNERS *Compliance Manual*. Trading fees charged by the custodians is also reviewed on a quarterly basis. FRONTIER FINANCIAL PARTNERS do not receive any portion of the trading fees.

Soft Dollars

FRONTIER FINANCIAL PARTNERS do not participate in any soft dollar relationships.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Review of Accounts

Periodic Reviews

Account reviews are performed quarterly by advisors Jeff Benson, President / Investment Advisor Representative, Jadyne Stevens Vice President / Investment Advisor Representative and Worsham Abbott, Investment Advisor Representative. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Regular Reports

Account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive periodic communications on at least an annual basis. *Advisory Service Agreement clients, Investment Management clients,* and *Retainer Agreement* clients may receive written quarterly updates. The written updates may include a net worth statement, portfolio statement, and a summary of objectives and progress towards meeting those objectives.

Client Referrals and Other Compensation

Incoming Referrals

FRONTIER FINANCIAL PARTNERS has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does compensate referring parties for these referrals if the referring party has a formal solicitor relationship with FRONTIER FINANCIAL PARTNERS. The fee is fully

disclosed to the client via the Solicitor's Disclosure Document.

Referrals Out

FRONTIER FINANCIAL PARTNERS may receive compensation from third-party advisors to which it directs clients. FFP currently has such a relationship with The Pacific Financial Group. The fee is fully disclosed to the client via the Solicitor's Disclosure Document.

Custody

Account Statements

All assets are held at qualified custodians. The custodian provides account statements directly to clients at their address of record at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by FRONTIER FINANCIAL PARTNERS / SYMMETRY PARTNERS.

Net Worth Statements

Clients are frequently provided net worth statements and net worth graphs that are generated from our financial planning software. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

Investment Discretion

Discretionary Authority for Trading

FRONTIER FINANCIAL PARTNERS and in some cases SYMMETRY PARTNERS through a co-advisory relationship or BETTERMENT SECURITIES through a sub-advisory relationship accepts discretionary authority to manage securities accounts on behalf of clients. FRONTIER FINANCIAL PARTNERS / SYMMETRY PARTNERS / BETTERMENT SECURITIES has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be

bought or sold. However, FRONTIER FINANCIAL PARTNERS consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. FRONTIER FINANCIAL PARTNERS does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

When requested, FRONTIER FINANCIAL PARTNERS will vote proxies on securities on behalf of Clients.

When assistance on voting proxies is requested, FRONTIER FINANCIAL PARTNERS will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Financial Information

Financial Condition

FRONTIER FINANCIAL PARTNERS does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

FRONTIER FINANCIAL PARTNERS provides an annual updated balance sheet to the state securities department per its regulations. Audited financial statements are not required because FFP does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$500 per client, and six months or more in advance.

Business Continuity Plan

General

FRONTIER FINANCIAL PARTNERS has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snowstorms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1-communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

FRONTIER FINANCIAL PARTNERS has an informal Business Continuation Agreement with another financial advisory firm to support FRONTIER FINANCIAL PARTNERS' clients in the event of Jeff Benson's serious disability or death.

Information Security Program

Information Security

FRONTIER FINANCIAL PARTNERS maintains an information/cyber security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

FRONTIER FINANCIAL PARTNERS is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may

include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

FRONTIER FINANCIAL PARTNERS encourages the advisors in its employ to have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CFS, CIS, AIF or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Accredited Investment Fiduciary (AIF): Accredited Investment Fiduciaries are accredited by the Center for Fiduciary Studies to use the AIF designation. AIF certification requirements:

- The AIF designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process.
- To receive the AIF designation, individuals must complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the *AIF Code of Ethics*.
- In order to maintain the AIF designation, the individual must annually renew their affirmation of the *AIF Code of Ethics* and complete six hours of continuing education credits.
- The certification is administered by the Center for Fiduciary Studies, LLC (a Fiduciary360 (fi360) company).

Certified Fund Specialist (CFS): Certified Fund Specialists are accredited by the Institute of Business and Finance to use the CFS designation. CFS certification requirements:

- CFS designees must complete an on-line course study program. Comprised of six modules covering a number of topics including mutual funds, ETF's, REIT's, closed-end funds, and similar investments. Candidates will cover advanced topics such as fund analysis and selection, asset allocation and portfolio construction, as well as sophisticated investment strategies for risk management, taxes and estate planning.

- Upon completion of the 15-week online course, candidates must successfully pass a comprehensive final examination.
- CFS professionals must have a bachelor's degree or 2,000 hours of experience completed in the financial services prior to completing the CFS course.
- All graduates must sign the *IBF Code of Ethics* and agree to adhere to the *IBF Standards of Practice*, both of which place client interests above those of the advisor and parent company.
- Designees are required to complete 30 hours of continuing education every two years to maintain their use of the CFS designation.

Certified Income Specialist (CIS): Certified Income Specialists are accredited by the Institute of Business and Finance to use the CIS designation. CIS certification requirements:

- CIS designees must complete an on-line course study program. Comprised of six modules covering a number of topics including retirement planning, cash reserves, closed-end funds, utilities, bonds, preferred shares, I-bonds, TIPS, Social Security, Medicare benefits, reverse mortgages and variable annuity living benefits.
- Upon completion of the 15-week online course, candidates must successfully pass a comprehensive final examination.
- CIS professionals must have a bachelor's degree or 2,000 hours of experience completed in the financial services prior to completing the CIS course.
- All graduates must sign the *IBF Code of Ethics* and agree to adhere to the *IBF Standards of Practice*, both of which place client interests above those of the advisor and parent company.
- Designees are required to complete 30 hours of continuing education every two years to maintain their use of the CIS designation.

Jeffrey P. Benson AIF, CFS, CIS, CAS

President / Investment Advisor Representative

Educational Background:

- Date of birth: 10/13/1961
- Institutions:
 - Vanderbilt University, BA in Business Administration, 1983

Business Experience:

- Frontier Financial Partners: Managing Partner / Investment Advisor Representative (09/2010 – current)
- Benson & Thomas Wealth Management: Managing Partner / Investment Advisor Representative (07/2005 – 09/2010)
- Spectrum Financial Solutions: Managing Partner / Investment Advisor Representative (03/2003 – 07/2005)

Disciplinary Information: None

Other Business Activities:

Jeff Benson is appointed as an insurance producer with One Resource Group an Insurance Marketing Organization in Roanoke, Indiana. Advisory Clients of Frontier Financial Partners are free to place their insurance business through Jeff Benson or any other insurance producer of their choosing. With the freedom to place insurance business through an insurance producer of their choosing the potential for conflicts of interest are effectively eliminated.

Jeff is a consultant with JPB, LLC where his activities include financial consultation with High- Net-Worth clients and Business Owners.

Jeff Benson is a mortgage loan originator with RocketPro Mortgage

Additional Compensation:

The compensation that Jeff earns on insurance products is standard and customary commissions. Jeff does not receive economic benefit from a non-advisory client for the provision of advisory services.

Supervision:

Jeff Benson is supervised by Jeff Benson, Chief Compliance Officer. As the Chief Compliance Officer, he is responsible for review of his own activities.

Jeff Benson's contact information:
PHONE: (615)482-6060
EMAIL: jeff.benson@frontierfp.net

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Joseph (Trey) A. Benson III

Investment Advisor Representative

Educational Background:

- Date of birth: 09/19/1960
- Institutions:
 - Washington and Lee University, BA in Art History, 1982

Business Experience:

- Frontier Financial Partners: Investment Advisor Representative (10/2010 to current)
- Frontier Consulting Group: Managing Partner (01/2015 to current)
- Avetta: Director of Product Strategy (03/2019 to current)
- Safety File: President (01/2015 to current)
- Industrial Safety Training Council: VP New Business Development, (10/2011 to 12/2014)
- LexisNexis: AVP of New Business, (02/2008 – 10/2011)
- First Advantage Corporation: Petrochemical Vertical Market Sales Executive, (03/2002 – 02/2008)

Disciplinary Information: None

Other Business Activities:

Joseph Benson III is the President of Safety File. His responsibilities have recently included managing a software development company that focuses on contractor workforce compliance management. His employment with Safety File accounts for more than 50% of income and time.

Additional Compensation:

Joseph Benson III does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Supervision:

Joseph Benson is supervised by Jeff Benson, Chief Compliance Officer. He reviews Joseph Benson's work through frequent office interactions as well as remote interactions. He also reviews Joseph Benson's activities through our client relationship management system.

SUPERVISOR'S contact information:

PHONE: (615)482-6060

EMAIL: jeff.benson@frontierfp.net

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Harvey Worsham Abbott

Investment Advisor Representative

Educational Background:

- Date of birth: 01/15/1955
- Institutions:
 - Virginia Commonwealth University, BA, 1977

Business Experience:

- Frontier Financial Partners: Investment Advisor Representative (01/2010 – present)
- Shephard & Vrbanc: Securities Principal (1992 – 2008)

Disciplinary Information: None

Other Business Activities:

Worsham Abbott is not engaged in any other invest-related activities.

Additional Compensation:

Worsham Abbott does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Supervision:

Worsham Abbott is supervised by Jeff Benson, Chief Compliance Officer. He reviews Worsham Abbott's work through frequent office interactions as well as remote interactions. He also reviews Worsham Abbott's activities through our client relationship management system.

SUPERVISOR'S contact information:
PHONE: (615)482-6060
EMAIL: jeff.benson@frontierfp.net

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Jadyn Michael Stevens CFS

Vice President / Investment Advisor Representative

Educational Background:

- Date of birth: 2/26/1977
- Institutions:
 - University of Tennessee
BA Communications/Journalism, 1999

Business Experience:

- Frontier Financial Partners: Director of Marketing / Investment Advisor Representative (12/2014 – current)
- Swiftwick: Regional Sales Manager (12/2011 – 05/2014)
- Eveready Press: Vice President (01/2004 – 11/2011)

Disciplinary Information: None

Other Business Activities:

Jadyn Stevens is appointed as an insurance producer with One Resource Group an Insurance Marketing Organization in Roanoke, Indiana. Jadyen also works as a real estate assistant with Heather Raymond of Realty ONE Group. Advisory Clients of Frontier Financial Partners are free to place their insurance business through Jadyn Stevens or any other insurance producer of their choosing. With the freedom to place insurance business through an insurance producer of their choosing the potential for conflicts of interest are effectively eliminated.

Additional Compensation:

Jadyn Stevens receives compensation for some of his real estate work with Heather Raymond of Realty ONE Group.

Supervision:

Jadyn Michael Stevens is supervised by Jeff Benson, Chief Compliance Officer. He reviews Jadyn Michael Stevens's work through frequent office interactions as well as remote interactions. He also reviews Jadyn Michael Stevens's activities through our client relationship management system.

SUPERVISOR'S contact information:

PHONE: (615)482-6060

EMAIL: jeff.benson@frontierfp.net

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: NONE

Bankruptcy Petition: None

Randy John Dooyema

Investment Advisor Representative

Educational Background:

- Date of birth: 10/13/1958

Business Experience:

- Frontier Financial Partners: Investment Advisor Representative (03/2021 – present)
- Financial Benefit Corporation: Owner, Operator, CEO (05/1985 – present)

Disciplinary Information: None

Other Business Activities:

Randy Dooyema is a registered insurance representative through Financial Benefit Corporation.

Additional Compensation:

Randy Dooyema does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Supervision:

Randy Dooyema is supervised by Jeff Benson, Chief Compliance Officer. He reviews Randy's work through frequent office interactions as well as remote interactions. He also reviews Worsham Abbott's activities through our client relationship management system.

SUPERVISOR'S contact information:

PHONE: (615)482-6060

EMAIL: jeff.benson@frontierfp.net

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None