

As with most financial services companies, Galt Financial Group, Inc. (referred to as “we” “us” “our” or “Firm”) has certain conflicts of interest that we feel is important for you to know. This brochure provides information about how we and our Financial Professionals are compensated and related conflicts of interest. In particular, the information below describes conflicts of interest associated with compensation received by us and our financial professionals ("Financial Professionals") on brokerage and referral services. We and our Financial Professionals are either compensated directly by customers, or indirectly from the investments made by customers. We can get paid an upfront commission at the time of the transaction, and/or ongoing compensation, typically called a trail payment, depending on how long a customer holds an investment. If we are paid an upfront commission, it means that the more transactions (investment deposits or contributions) a customer makes, the more we are paid. The amount we receive varies depending on the particular type of investment a customer makes. In addition to commissions and trails, we receive compensation from the sponsors of the products that customers purchase through us, some of which is described below. The compensation described in this document represents the maximum compensation we receive on an investment before subtraction of any expenses.

Please note that not all of the conflicts described in this brochure apply to a particular Financial Professional or his or her services and the products we sell, and the types and amounts of compensation we receive, may change over time. We encourage you to periodically review this disclosure document for material updates. Customers should ask their Financial Professional if they have any questions about compensation and/or conflicts of interest. Please also visit [www.hillfinancialadvisors.com](http://www.hillfinancialadvisors.com) for more information on this topic, such as the compensation we receive from product sponsors and related conflicts of interest.

### Commissions and Sales Related Compensation

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**Commissions and Sales Charges.** We receive upfront commissions when we execute transactions that result in the purchase or sale of a security. A commission, which also may be called a sales load, sales charge or placement fee, is typically paid upfront, can reduce the amount available to invest, can be charged directly against an investment and is often based on the amount of assets invested. We receive a portion of the sales charge or commission and share it with our Financial Professional. In many cases, a portion of the sales charge or commission is retained by the investment sponsor. Commissions vary from product to product. This creates an incentive to sell a higher commission security rather than a lower commission security. For more information about the commissions that apply to a particular transaction, please refer to the applicable prospectus or other offering document and/or transaction statement.

Compensation Type	Description	Fee Structure
Mutual Funds	We charge the following maximum upfront % commission paid for new deposits into mutual funds. This varies on the amount and fund company, and breakpoint applied.	0%-5.75 % max
Annuities	We charge the following maximum upfront % commission paid for new sales of annuities, but varies depending on the time purchased, and type of annuity, such as fixed, fixed index, traditional and investment-only variable annuities.	1%-8% max permitted. Typically 6% max
Alternative Investments	For alternative investment products, such as publicly offered, hedge funds, private equity funds, non-traded business development companies ("BDCs"), real estate private placements, or real estate investment trusts ("REITs"), the upfront sales load can be a higher %.	1%-8% max permitted. Typically 5% max

### Third-Party Compensation

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We and our Financial Professionals receive compensation from investment sponsors, in connection with investments the customers make in securities, such as mutual funds, annuities, alternative investments and derivatives. The types of third-

party compensation are described below.

**Trail Compensation.** We and our Financial Professionals receive ongoing compensation from investment products, such as mutual funds, annuities and alternative investments. This compensation (commonly known as trails or Rule 12b-1 fees) is typically paid from the assets of the investment under a distribution or servicing arrangement with the investment sponsor, is calculated as an annual percentage of invested assets, and is shared between us and our Financial Professional. Our fees are based on the value of your investment in the investment product. Therefore, we have an incentive to encourage you to increase the size of your investment. The amount of trails received varies from product to product. This creates an incentive to recommend a product that pays a higher trail rather than a lower trail. For more information about trail compensation received with respect to a particular investment, please refer to the prospectus or offering document for the investment.

Compensation Type	Description	Fee Structure
Mutual Funds	The ongoing payment depends on the class of shares but is typically the following % range based on assets annually.	0% - 1% of assets annually Typically .10% - .25%
Annuities	We receive a trail commission from the annuity issuer for the promotion, sale and servicing of a policy. The amount and timing of trailing commissions vary depending on the agreement between us and the issuer, and the type of policy purchased. The maximum trailing commission for annuities is typically a % and varies depending on the type of annuity.	0% - 1% of assets annually
Alternative Investments.	For alternative investment products, such as private funds, trail payments are typically a % range on an annual basis.	0% - 1% of assets annually

**Non-Cash Compensation.** We, our employees and our Financial Professionals receive compensation from investment sponsors that is not in connection with any particular customer. Compensation includes such items as gifts valued at less than a specified amount annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings, Customer workshops or events, or marketing or advertising initiatives, including services for identifying prospective Customers. Investment sponsors also pay for or reimburse us for the costs associated with education or training events that may be attended by our employees and representatives and for our sponsored conferences and events.

Compensation Type	Description	Fee Structure
Non-Cash Compensation	Compensation includes such items as gifts valued at less than an annual specified amount, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings, Customer workshops or events, or marketing or advertising initiatives, including services for identifying prospective Customers	Gifts valued less than \$100 annually

## Trade Errors & Corrections

If a customer holds an account with us, in the event a trade error occurs in the account, and such error is determined to be caused by us, we will cancel the trade and remove the resulting monetary loss to a customer from the account. If a trade correction is required as a result of a customer (e.g., if a customer does not make full payment for purchases or fails to deliver negotiable securities for liquidations before trade settlement), we will cancel the trade and any resulting monetary loss will be borne by the customer. In the case of a trade that requires a correction as described above and that resulted in a monetary gain to the customer, such gain may be removed from the account and may result in a financial benefit to us.

## Share Class Selection

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We offer various share classes of mutual funds. As an example, certain mutual fund share classes, often referred to as Class A shares, pay an upfront sales charge and an ongoing trail. For other mutual fund share classes, often titled Class C shares, there is no upfront sale charge paid, however, there is an ongoing trail payment and a contingent deferred sales charge to the investor if there is a redemption within a certain period of time after purchase. Depending on the length of the holding period for the mutual fund, and other factors, one share class may be less expensive to the investor than another, and we and our Financial Professionals may earn more or less in compensation for one share class than another.

## Compensation for Other Services

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We and our Financial Professionals can offer various types of advisory and brokerage programs, platforms and services and therefore we and our Financial Professionals can earn more or less if a certain type of service, program or platform is recommended.

## Independent Financial Professional Compensation

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We generally compensate our Financial Professionals pursuant to an independent contractor agreement, and not as employees. Our Financial Professionals are entitled to receive compensation and other benefits from us described below:

Compensation Type	Description	Fee Structure
Cash	We typically pay our Financial Professionals a percentage of the revenue he or she generates from sales of products and services. The percentage received can vary depending on his or her agreements with us and the investment product or service recommended and can be more or less than what he or she would receive at another brokerage firm. The payments can include a bonus that is based on the amount of revenue our Financial Professional generates through our firm.	75% - 100% of product sales

## Fees Charged to our Financial Professionals

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We charge our Financial Professionals various fees under its independent contractor agreement, for example, for trade execution, administrative services, technology and licensing. Depending on the situation, these fees make it more or less profitable to offer certain services or products over others. In certain cases, these fees are based on our Financial Professional's overall business production or the amount of assets serviced by our Financial Professional. In the case of transaction fees, they are more or less depending on the type of security that our Financial Professional recommends.

## Outside Business Activities

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Our Financial Professionals are permitted to engage in certain approved business activities other than the provision of brokerage and advisory services through us, and in certain cases, our Financial Professionals could receive greater compensation, benefits and non-cash compensation, through the outside business than through our firm. Our Financial Professionals could also be an accountant, real estate agent, tax preparer, lawyer, or refer customers to other service providers and receive referral fees, for example. As other examples, our Financial Professionals could provide advisory or financial planning services through an independent unaffiliated investment advisory firm, sell insurance through a separate business, or provide third party administration to retirement plans through a separate firm. If our Financial Professionals provide investment services to a retirement plan as a representative of our firm and also provides administration services to the plan through a separate firm, this typically means our Financial Professional is compensated from the plan for the

two services. If you engage with one of our Financial Professionals for services separate from us, you may wish to discuss with him or her any questions you have about the compensation he or she receives from the engagement.

## Compensation of Sales Support Employees

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Certain of our employees provide sales support resources to our Financial Professionals who offer various types of brokerage and advisory products, programs, platforms and services. The compensation that we pay to these employees varies based on a number of factors, including assets in the program and compensation earned by us from the sales of these products and services. These sales employees have an incentive to promote our programs and platforms to our Financial Professionals over others or those available through third parties.

## Payment for Referrals

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We offer programs where we pay independent professionals, such as attorneys or accountants, for referrals. In one such program, we pay professionals for referrals exclusively to its advisory business, and customers must acknowledge the referral payment to the professional. In another program for accountants, the accountants become registered as representatives of our firm and share in brokerage commissions and advisory fees in connection with the referral. We and our Financial Professionals may enter into lead generation, marketing and referral arrangements with third parties and other financial intermediaries, including for the purpose of introducing new customers. The fees paid for these services can be structured in various ways, including an ongoing flat fee. In addition, financial institution employees who are not associated with us, but who refer prospective customers to our Financial Professionals, may receive a nominal referral fee from the financial institution as compensation for each referral.

Compensation Type	Description	Fee Structure
Referrals	Fees paid for referrals may be paid as either an ongoing flat fee or a nominal referral fee from the financial institution a flat fee as compensation for each referral.	Ongoing fee of \$0 - \$100 for each referral

## Rollovers

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If a customer decides to roll assets out of a retirement plan, such as a 401(k) plan, into an individual retirement account ("IRA") with us, we have a financial incentive to recommend that a customer invests those assets with or through us, because we will be paid on those assets, for example, through commissions, fees and/or third party payments. A customer should be aware that such fees and commissions likely will be higher than those the customer pays through the plan, and there can be custodial and other maintenance fees. As securities held in a retirement plan are generally not transferred to an IRA, commissions and sales charges may be charged when liquidating such securities prior to the transfer, in addition to commissions and sales charges previously paid on transactions in the plan.

## Limitations on Our Investment Recommendations

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We and our Financial Professionals offer and recommend investment products only from investment sponsors with which we have entered into selling and distribution agreements. Other firms may offer products and services not available through us, or the same or similar investment products and services at lower cost. In addition, we may only offer certain products in a brokerage account, even though there is a version of the product that may be lower cost and could be available in an advisory account, and vice versa. The scope of products and services offered by our individual Financial Professionals may also be more limited than generally available through us, based on their licensing, training or branch office policy restrictions. You may ask our Financial Professionals about the securities or services he or she is licensed or

qualified to sell, and their ability to service investments transferring to us from another firm.

Please consult the Disclosures page on our website for the current information about our brokerage compensation and related conflicts of interest. We post changes to this disclosure on its website from time to time. We may not notify you when these changes are made, so you should consult the website to learn about any changes that have been made. If you are unable to access the website or require paper copies of any documents referenced here, please contact one of our Financial Professionals or our Customer Service department at (805) 449-1132.