

401(k) Optimizer Disclosures

The 401(k) Optimizer® is a web-based tool intended to help clients invest in their employer's 401(k) or similar defined contribution plans including 401(k)s, 403(b)s, and 457, as well as HAS (Health Savings Account and Profit Sharing Plans). Clients receive professional recommendations from the 401(k) Optimizer® and maintain total control over their personal accounts. The goal is to reduce risk by taking proactive measures with company-sponsored retirement plans. Changes in investment strategies, contributions or withdrawals may materially alter the performance, strategy, and results of your portfolio. Different types of investments involve varying degrees of risk, and there can be no assurance that any specific investment (including the investments and/or investment strategies recommended by the advisors), will be equal to past performance level, equal any corresponding indicated historical performance level(s), be suitable for your portfolio or individual situation, or be profitable for a client's portfolio. All investment strategies have the potential for profit or loss. Economic factors, market conditions, and investment strategies will affect the performance of any portfolio and there are no assurances that it will match or outperform any particular benchmark for measuring the performance of a portfolio.

Changes in investment strategies, contributions or withdrawals, and economic conditions may materially alter the performance of your portfolio. Different types of investments involve varying degrees of risk, and there can be no assurance that any specific investment or strategy will be suitable or profitable for an investor's portfolio.

A self-directed brokerage account ("SDBA") within a retirement plan account allows participants to invest their self-directed retirement plan account balances in a variety of investments beyond the menu of designated investment alternatives offered directly by the plan. SDBAs are sometimes referred to as "self-directed brokerage windows." A SDBA provides participants with the ability to choose from among additional investment options, which can include corporate stock, mutual funds, bonds, exchange traded funds, and/or options. HCM offers 4 managed models for our SDBA clients. These models range from Conservative to Aggressive which all include a variation of HCM's proprietary Mutual Funds. All clients are required to complete a risk tolerance questionnaire to determine which model is best suited for them based on their risk tolerance. These SDBA models are comprised of our 3 HCM proprietary mutual funds.

HCM's SDBA model strategies are designed to maximize returns through full market cycles by investing in any combination of asset classes and styles as determined by our quantitative model. The SDBA strategies utilize the HCM-BuyLine® proprietary indicator to monitor market conditions and assist in determining whether or not assets should be invested in equity products or moved to cash, cash equivalents, or bond funds. Multiple indicators are monitored in an effort to identify such trends in the equity markets. The strategies are rebalanced periodically, and it is possible for the allocation to be adjusted, including when the HCM-BuyLine® indicates a strengthening or weakening of the equity markets. The net asset value per share of this HCM program will fluctuate as the value of the securities within the portfolio change. Because this Howard Capital Management, Inc. (HCM) strategy is actively managed, it may experience above-average turnover, which could increase transaction costs and have a negative impact on account performance. Naturally, there can be no guarantee that the HCM-BuyLine® indicator will perform as anticipated. HCM-BuyLine® does not produce an actual stoploss order that automatically sells securities in the portfolio at a certain price. Stoploss signals will not necessarily limit

your losses to the desired amounts due to the limitations of the HCM-BuyLine®, market conditions, and delays in executing orders.

LIMITATIONS OF HCM OPTIMIZED TREND INDICATOR (OTI)

The materials contained herein are intended for the exclusive use of the Subscriber, and any replication, reproduction, or dissemination of these materials without the written consent of Howard Capital Management, Inc. ("HCM") is prohibited. The HCM Optimized Trend Indicator ("OTI") is a tool developed by HCM to help assist a subscriber to determine what portion, if any, of the selected stock should be bought, sold or held in the subscriber's retirement portfolio as of a particular date. Subscribers maintain absolute discretion as to whether or not to follow the OTI recommendations. It remains the subscriber's exclusive responsibility to review and evaluate the OTI and his/her stock and to determine whether to accept or reject any recommendation, to correspondingly determine whether any OTI recommendation is appropriate for the financial situation or investment objective of Subscriber and/or Subscriber's underlying client(s) (for which HCM has and expresses no knowledge or opinion), and to implement any OTI signals upon which the subscriber determines to act. The buy or sell signals reflected in the chart above do not reflect actual signals generated by the OTI but were achieved through retroactive application of the OTI to the specific security selected. The hypothetical OTI signals above are provided with the benefit of hindsight. Such back tested signals have inherent limitations, particularly the fact that these results do not represent actual signals and/or trading and may not reflect the impact that material economic and market factors might have placed on the composition of the OTI model and the manner in which the OTI's composition would have impacted the signals generated by the OTI. These signals should not be viewed as indicative of the adviser's skill and do not reflect the performance results that were achieved by any particular client or Subscriber. All investing comes with risk, including risk of loss, and neither past performance, nor the hypothetical signal performance shown herein, can guarantee future results.

Howard Capital Management, Inc. ("HCM") is an SEC-registered investment advisor with its principal place of business in the State of Georgia. SEC registration does not constitute an endorsement of HCM by the SEC, nor does it indicate that HCM has arraigned a particular level of skill or ability. HCM only transacts business where it is properly registered or is otherwise exempt from registration. This presentation is limited to the dissemination of general information pertaining to its investment advisory/management services. Any subsequent, direct communication by HCM with a prospective client shall be conducted by a representative that is either registered or qualifies for an exemption or exclusion from registration in the state where the prospective client resides. For information pertaining to the registration status of HCM, please contact HCM or refer to the Investment Advisor Public Disclosure web site (www.adviserinfo.sec.gov). For additional information about HCM, including fees and services, send for our disclosure statement as set forth on Form ADV from us using the contact information herein. Please read the disclosure statement carefully before you invest or send money. All investment approaches have the potential for loss as well as gain. There is no certainty that any investment or strategy (including the investments and/or investment strategies recommended by the advisor), will be profitable or successful in achieving investment objectives. Please work with your financial professional to determine which investment program is consistent with your financial objectives and risk tolerance. LARL.401KOPTWEB.DASH.122024 | HCM-122424-143